DOCUMENT RESUME

ED 285 965 UD 025 765

AUTHOR Farrar, Eleanor; And Others
TITLE State and Local Administration of the Chapter 1 Program. Volume 1.
INSTITUTION Abt Associates, Inc., Cambridge, Mass.
SPONS AGENCY Office of Educational Research and Improvement (ED), Washington, DC.
PUB DATE 1 Dec 86
CONTRACT NIE-400-85-1017
NOTE 166p.; For appendix volume, see UD 025 766.
PUB TYPE Reports - Descriptive (141)

EDRS PRICE MF01/PC07 Plus Postage.
DESCRIPTORS *Administration; *Compensatory Education; Compliance (Legal); Educationally Disadvantaged; Elementary Secondary Education; *Federal Aid; Federal Programs; *Federal State Relationship; Program Implementation; Resource Allocation; School Districts; *State School District Relationship
IDENTIFIERS *Education Consolidation Improvement Act Chapter 1

ABSTRACT

This report presents findings from a study of state and local administration of Chapter 1 of the Education Consolidation and Improvement Act. The report is divided into six chapters. Chapter 1 presents an overview of the history of Title 1/Chapter 1 and the major conclusions of the study. Chapter 2 describes current administrative practices and changes in practices at both the state and district level. Chapter 3 explores factors influencing administrative practice. Chapter 4 describes how select administrative policies are interpreted and carried out, noting especially state influence on district practice. Chapter 5 examines the effects of state administration on compliance and program improvement and the contributions of Chapter 1 administration to program operation. Chapter 6 discusses trends in state Chapter 1 administration and possible options for Federal action. The major conclusion is that, since the law went into effect, state administrative structures have not been transformed, but considerable differences between states are seen, and emphases and activities are changing. By and large, states have not shifted from regulatory compliance to quality programming. Chapter 1 school and student selection requirements are reportedly well-implemented in school districts. The connection between administrative requirements and the quality of Chapter 1 programs has not been established and the contributions of evaluation and parent involvement requirements to Chapter 1 programming depend in large part on district influences. (KH)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

STATE AND LOCAL ADMINISTRATION OF THE CHAPTER 1 PROGRAM

VOLUME I

Eleanor Farrar and Mary Ann Millsap
Co-Principal Investigators

Other Authors:
Bonnie Nutt-Powell
Nancy R. Wilber
Jennifer C. Greene
Brenda J. Turnbull
Ellen L. Marks

December 1, 1986

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

O.E.R.I.
U.S. Dept. of Ed.

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

U.S. DEPARTMENT OF EDUCATION
Office of Educational Research and Improvement
EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)

This document has been reproduced as received from the person or organization originating it.

☐ Minor changes have been made to improve reproduction quality.

• Points of view or opinions stated in this document do not necessarily represent official OERI position or policy.

BEST COPY AVAILABLE

Abt Associates Inc.
55 Wheeler Street, Cambridge, Massachusetts 02138
Telephone • Area 617-492-7100
TWX: 710-3201382

STATE AND LOCAL ADMINISTRATION OF THE CHAPTER 1 PROGRAM

VOLUME I

Eleanor Farrar and Mary Ann Millsap
Co-Principal Investigators

Other Authors:
Bonnie Nutt-Powell
Nancy R. Wilber
Jennifer C. Greene
Brenda J. Turnbull
Ellen L. Marks

December 1, 1986

Prepared for:

Office of Educational Research and Innovation
U.S. Department of Education
555 New Jersey Ave., NW
Washington, D.C. 20208

NIE-400-85-1017

Contract Manager	Quality Control Reviewer	Management Reviewer
Mary Ann Millsap	Robert G. Rice	Jean C. Wood

PREFACE

The study of state and local administration of Chapter 1 of the Education Consolidation and Improvement Act is one of seven major studies commissioned by the Office of Education Research and Innovation of the U.S. Department of Education at the request of Congress. As part of the national assessment of Chapter 1, the study results will provide information to Congress for Chapter 1 reauthorization. The AAI study is the only study to explore how federal policy is carried out by state and local administrators, and to analyze the relative influence of federal, state and district factors on state and district administration of Chapter 1.

The report is organized in two volumes. The first volume is designed for general readership. The first chapter presents an overview of the history of Title I/Chapter 1 administration and the major conclusions of the study. Chapter 2 describes current administrative practices and changes in practices at both the state and district level. Chapter 3 explores factors influencing administrative practice. Chapter 4 describes how select administrative policies are interpreted and carried out, noting especially state influence on district practice. Chapter 5 looks at the effects of state administration in compliance and program improvement and at the contributions of Chapter 1 administration to program operation. The final chapter brings together trends in state Chapter 1 administration and possible options for federal action.

Because detailed descriptions of administrative policies and practices were sought, a separate appendix of this report discusses each policy and practice in some detail, including the federal framework, previous research, and AAI findings. The appendix volume also contains two special topics affecting state and local administration in 1985-86 -- nonpublic schools and carryover funds -- and presents a methodological note on sample selection and data collection and analysis.

ACKNOWLEDGEMENTS

We would first like to thank the state Chapter 1 directors and their staffs, district Chapter 1 coordinators and their administrative staffs, and the teachers and principals in Chapter 1 schools who spent countless hours with our field teams discussing what they do. Hundreds of people were interviewed in the 20 states and 27 school districts we visited in 1985-86.

We would want especially to thank our field teams who collected and analysed data, wrote case reports, filled out data displays and prepared analytic memos on their states and who also worked with us to explore themes and trends across all states. We greatly appreciate their keen analytic minds and spirit of comeraderie. The members of our field teams were: Beverly Anderson, Jane Armstrong, and Patty Flakus-Mosqueda of the Education Commission of the States; Alan Davis of Northwest Regional Educational Laboratory; Brenda Turnbull, Ellen Marks and Joanne Bogart of Policy Studies Associates, Inc; Robert Yin and Johanna Lackner of Cosmos, Inc.; Donald Burnes of Washington, D.C.; Jennifer Greene of Cornell University; Allan Odden and Tyson Reyes of the University of Southern California; Sheila Rosenblum of Wilkes-Barre, PA; Nancy Wilber and Anthony Cipollone of the Harvard Graduate School of Education; and Bonnie Nutt-Powell and Diane Kell of Abt Associates.

Dr. Matthew Miles played a pivotal role in this study and helped us address many data analysis issues. He served as senior consultant as we designed our case studies and data displays around his and Michael Huberman's approach for qualitative data analysis, and chaired with us the two-day training session and the two three-day analytic meetings with the field teams.

A special thanks goes to the project's Advisory Panel who helped us with our initial planning and also critiqued this report. The Panel's members are: Dr. Naida Bagenstos, formerly with the New Jersey State Department of Education and now with the Southeastern Educational Improvement Laboratory (Research Triangle Park, North Carolina); Michael Gaffney, Esq., of Gaffney, Anspach, Schember, Klimaski and Marks (Washington, D.C.); Dr. Peirce Hammond, formerly with the Cleveland Public Schools and now with the Southeastern

Educational Improvement Laboratory (Research Triangle Park, North Carolina); Dr. William Metz, Superintendent of Schools (Monte Vista, Colorado); Mr. Robert Marley, State Director of Chapter 1 Programs (Raleigh, North Carolina); Mrs. Rosemary Perez, Federal Programs Director (San Antonio, Texas); and Dr. Paul Peterson of the Brookings Institution (Washington, D.C.).

We would also like to thank Dr. Diane Bushner, Chapter 1 coordinator of Cambridge, Massachusetts, for briefing us and the field teams during our fall training on administrative issues faced by district Chapter 1 coordinators.

Maria Sachs, our cosmopolitan, urbane and highly literate editor, is to be credited with making the report clear, flowing and readable.

We would also like to acknowledge the able help of Karen Shershow of Abt Associates who served as our research assistant on this project and the efforts of our multi-talented project secretary, Gail Rundlett.

We would also like to thank our project officer, Dr. Martin Orland, and other members of the OERI Chapter 1 Study Team, for commenting on our work and helping coordinate the various Chapter 1 studies.

The interpretations and conclusions in this report remain our own, as does the responsibility for any errors in the text.

Eleanor Farrar
Mary Ann Millsap

Co-Principal Investigators

CONTENTS

VOLUME I.....i

PREFACE.....ii

ACKNOWLEDGMENTS.....iii

TABLE OF CONTENTS.....iv

Chapter

1. OVERVIEW OF STATE AND LOCAL CHAPTER 1 ADMINISTRATION

History of Title I and Chapter 1 Administration.....1
Study Questions and Methodology.....4
Conclusions.....6
Federal Policy Options.....10

Chapter

2. STATE AND LOCAL ADMINISTRATIVE PRACTICES IN THE CHAPTER 1 PROGRAM

Introduction.....13
State Chapter 1 Administration.....14
Local Chapter 1 Administration.....33

Chapter

3. FACTORS AFFECTING STATE AND LOCAL CHAPTER 1 ADMINISTRATIVE PRACTICES

Introduction.....53
State Chapter 1 Administration.....53
Local Chapter 1 Administration.....71
Conclusion.....82

Chapter

4. CHAPTER 1 ADMINISTRATIVE POLICIES

Introduction.....85
Comparability.....87
Targeting: School Selection.....91
Targeting: Student Selection.....93
Supplement Not Supplant.....97
Evaluation.....100
Parent Involvement.....105
Policy Issues.....108

Chapter

5. AN ASSESSMENT OF CHAPTER 1 ADMINISTRATION AND ITS EFFECTS

Introduction.....117
The Effects of Administration on Compliance Related Activities.....119
The Effects of Administration on Program Development.....130
The Effects of Administration on Chapter 1 Program Operations.....135
Conclusion.....143

Chapter

6. TRENDS IN STATE CHAPTER 1 ADMINISTRATION AND POLICY OPTIONS

Introduction.....147
Projected Trends.....147
Federal Policy Options.....152

REFERENCES.....159

CHAPTER 1

OVERVIEW OF STATE AND LOCAL CHAPTER 1 ADMINISTRATION

HISTORY OF TITLE I AND CHAPTER 1 ADMINISTRATION

Title I of the Elementary and Secondary Education Act (ESEA) emerged in the mid-1960's from a combination of forces. Voices within the civil rights movement urged educational equity as a federal responsibility, provided federal funds did not go to support segregated schools. Public officials and school people sought federal funds to handle increasingly overcrowded classrooms and substandard school facilities. Various religious-affiliated organizations also sought public support for private schooling. The law revamped the traditional relationship among federal, state, and local governments, giving the federal government direct entry into state and district educational matters through the influx of federal dollars and the fiscal accountability mechanisms that accompanied them.

Initially, the federal government paid little attention to state and local administration of the program, and both states and school districts misspent Title I funds, perhaps as much as 15 percent of allocations in the first five years (Martin and McClure, 1970; Jung, 1983, p. 97). Over the next five years, federal oversight greatly increased, and Congress clarified a number of provisions to strengthen the categorical nature of the program and to specify allowable state and local practices. By the mid-1970's, a strong federal role and a cadre of committed and experienced state and local Title I administrators had substantially reduced uncertainty or disregard of program requirements (McLaughlin et al., 1985). Many of the earlier compliance issues had been resolved (Goettel et al., 1977), and programs operated with fewer problems.

Yet federal guidance about states' administrative responsibilities remained unclear. Some functions were defined but others were only implied. The rulemaking authority of state educational agencies (SEAs), enforcement authority, and audit procedures were ambiguous (NIE, 1977, pp. 46-47). A major study of Title I administration in eight states corroborated earlier findings of widely differing practices in how SEA Title I administrations disseminated information, provided technical assistance and enforced compliance (Goettel et al., 1977). In its report on Title I to Congress, the

National Institute of Education (NIE) reported that that variation was due to two factors: lack of clarity about states' precise responsibilities, and differences in state staff and caseloads (arising mostly from the difference in number of districts) (NIE, 1977, p. 52).

In the 1978 amendments to Title I, Congress directed that changes be made in the legal framework of Title I, in part to make the administrative requirements as clear as possible. The ceiling on funds for state administration was also raised from 1 to 1.5 percent of the state allocation. What had begun as a nine page law was now a 48 page law.

Specificity in the legal framework was intended to foster flexibility, not only to increase prescriptiveness. While evaluation and parent involvement language outlined specific requirements, school and student selection policies detailed allowable options. The options were incorporated because those who framed the legislation believed that the lack of guidelines fostered narrow interpretations of the statutes. The NIE study, for example, recognized that states sometimes rigidly interpreted provisions (e.g., by requiring pullout programs) to avoid audit exceptions (Burnes and Moss, 1978; Gaffney, Thomas and Silverstein, 1977; Goettel et al., 1977).

National studies of state and local Title I administration under the new, more prescriptive law suggest that Congress went too far (Bessey et al., 1982, p. xvii; AdTech, 1983). One national study noted major tensions in the desire for greater local or state control, often at the expense of federal control (Bessey et al., 1982, p. xvii). Parent involvement and evaluation policies were areas of special concern. States resented the structure imposed on them for parent involvement; and states that believed evaluation to be a local concern appeared to find the effort required to implement the evaluation models excessive (Bessey et al., 1982, p. xviii). District Title I directors generally felt requirements for parent involvement were both unnecessary and burdensome, while regarding evaluation as necessary but burdensome for achieving program goals (AdTech, 1983, pp. 1-5, 1-6).

Under a new federal administration committed to simplifying federal law and reducing the federal role in education, Congress passed the Education Consolidation and Improvement Act (ECIA) in the summer of 1981. Chapter 1 of ECIA replaced Title I and dramatically altered both the prescriptiveness of the law and the strength of the federal role. The new six page law maintained

the overall purpose of Title I to provide "financial assistance to state and local education agencies to meet the special needs of educationally deprived children," but eased federal involvement by doing so "in a manner which will...free the school of unnecessary Federal supervision, direction and control" (PL 97-35). A number of options and requirements were removed. Much of the language on state administration was deleted, and the 1.5 percent set-aside for state administration was reduced to one percent.

At the same time as federal laws were simplified and consolidated, efforts began to reduce the number of federal agency staff and the substantive guidance from the U.S. Department of Education (ED). Between 1981 and 1984 two reductions in force (RIFs) occurred, affecting Chapter 1 and other program areas. Currently, total ED staff is 25 percent below 1981 levels.

Initial reaction to Chapter 1 was mixed. The lack of detail, coupled with little legislative debate and ED's deliberately nonprescriptive approach to rulemaking, created uncertainty, even though Nonregulatory Guidance and Technical Amendments were forthcoming. Some observers argued that Chapter 1's ambiguity, together with the weak commitment in many states to low income students, would result in diluted services (McDonnell and McLaughlin, 1982, p. 113).

Some state Chapter 1 directors applauded the flexibility of the new law. Many others, however, were uneasy about its vagueness, which they felt might again lead to varying practices and potential audit exceptions (Bessey et al., 1982, p. xxxii). There was also concern that without federal guidance, state administration would focus heavily on compliance and interpret Chapter 1 narrowly to avoid problems with auditors who might later interpret the legislation differently (McLaughlin, 1982).

Some researchers argued that Chapter 1 could endanger a "quality management style" of SEA administration. The intense monitoring associated with quality management could no longer be afforded, and tailormade technical assistance on quality matters would be cut, owing both to the set-aside reduction and to the absence of a legal mandate to provide it (Bessey et al., 1982, p. xxxiii).

Supporters contended, on the other hand, that state and local governments were committed to serving educationally disadvantaged children,

and that increased flexibility would allow them to focus on quality programs as opposed to compliance with federal regulations (Bell, 1981). Supporters looked forward to a reduction in paperwork for both states and school districts.

Initial concerns that Chapter 1 would signal the end of supplemental programs for educationally disadvantaged students proved groundless, especially when projected budgets cuts of 50 percent were not realized.* The regulations and Nonregulatory Guidance clarified some of the ambiguity in the legislation, especially on student and attendance area selection; and the Technical Amendments of 1983 reinstated a number of key provisions to strengthen the categorical nature of the program. They also clarified state rulemaking authority.

Whether state and local administration under Chapter 1 is more flexible, less burdened with paperwork, and more focused on quality programming as supporters hoped; or, by contrast, is more compliance oriented and less focused on quality, are questions addressed by this study. Some attention is also paid to whether Chapter 1 administrative practices and policies appear to have led to Chapter 1 funds being spread over an increasing number of schools and students.

STUDY QUESTIONS AND METHODOLOGY

In the late summer of 1985, three years after Chapter 1 first went into effect, this study was commissioned to address four questions:

- What administrative practices and policies are being carried out at the state and local level in response to Chapter 1 requirements?
- How have state and local administrative practices and policies changed since Chapter 1 replaced Title I?

---

*Recent federal appropriations for Title I/Chapter 1 are: FY 80, $3.2 billion; FY 81, $3.1 billion; FY 82, $3.0 billion; FY 83, $3.2 billion; FY 84, $3.5 billion, and FY 85, $3.7 billion. Slight increases in the appropriations in recent years have not kept pace with inflation and increased costs.

- What factors have influenced state and local administrative practices carried out under Chapter 1?
- What contributions are made by administrative practices and policies to the Chapter 1 program delivered to students?

Administrative practices are the processes of administration. At the state level, these processes are monitoring, technical assistance, application review and approval, and rulemaking. Auditing also came under the purview of this study although it is not carried out by state Chapter 1 staff. At the district level, administrative practices include managing and supervising the instructional program, staff development, and preparation of applications and other reports. Administrative policies are the substance of Chapter 1 administration and include fund allocation and program design requirements.*

To address these questions with sufficient breadth, 20 states were visited to gather primarily descriptive information. Nine of them were then revisited for more detailed information on state administration and information on districts. For the 20 state sample, we sought proportional representation across each of three variables: geographic region, public school enrollment, and percent of children in poverty. Other selection criteria included the presence of state compensatory education and/or school improvement programs, and directiveness and orientation (e.g., compliance vs quality) of state Chapter 1 administrations. The nine state sample was chosen using the same criteria. In each of the nine states, three districts were selected on the basis of public school enrollment, percent of low income children, and geographic spread within the state. Three Chapter 1 schools were visited in each district. While no generalizations can be made to the nation as a whole from our sample of states and districts, the factors influencing state Chapter 1 administrations probably operate in the same fashion in states with similar characteristics.

---

*The five fund allocation requirements are comparability, targeting, selecting students, supplement not supplant, and maintenance of effort. The four program design requirements are evaluation; parent involvement; size, scope and quality; and needs assessment.

Site field work began in November of 1985 in the 20 states. In December the nine states were revisited, including one school district in each. In February of 1986, the remaining two school districts were visited and a final visit was made to SEA. Interviews were held with state Chapter 1 directors and staff, senior SEA officials, state personnel responsible for auditing, and others with longstanding knowledge of state education issues. Within school districts, interviews were held with Chapter 1 coordinators and staff, senior district personnel, and principals and regular and Chapter 1 teachers in three schools. Approximately 33 person days were spent in the nine intensive states, including 20 days in districts. Correspondingly more time was spent in large districts than small districts. An average of six person days were spent in the 11 other states in the sample. Unlike earlier studies of Title I administration that averaged close to two years, this study was completed in one year. (Sampling and data collection and analysis methods are detailed in Volume II.)

CONCLUSIONS

State Chapter 1 administrative structures have not been transformed since the law went into effect. No states changed their organizational structure. One state in our sample consolidated all supplemental programs but had initiated the change before Chapter 1. States also did not change the structure of their relationships with school districts. All but one of the nine states intensively studied continue a "generalist" structure, with one professional consultant generally responsible for all functions (e.g., monitoring, technical assistance, application approval) for a number of school districts. The reduction in the set-aside decreased state activity and the number of specialist positions, but not the structure of operations. Further reductions in staff and functions occurred in only one state -- the changing state that sought to deregulate the state role in Chapter 1. (Current activities are discussed in Chapter 2; the effects of the set-aside reduction are covered in Chapters 2 and 3.)

There are several reasons for little rethinking of state roles. Federal administration of Chapter 1 is perhaps better characterized as nonregulation (i.e., nonspecificity) than deregulation (Darling-Hammond and Marks, 1983, p. xi). The absence of clear directions, coupled with a

continuing audit function, led most states to retain paper compliance activities. Fiscal conservatism and wariness of audits are also strong state influences precluding change in traditional Chapter 1 administrations, the bulk of states in our sample.

The maturity of Chapter 1 administration also encouraged stability. Working relationships are well established, Chapter 1 staff are strongly committed to the program, and embedded procedures resist change, either because they are seen as "best practice" or because the resources needed to make more than incremental changes appear excessive. (See Chapter 3 for more details.)

Although we have yet to see structural change in state Chapter 1 administration, state administrations are different from one another, and emphases and activities are changing. Some state administrations have become more compliance oriented and stripped away staff development and program improvement activities when the set-aside was reduced. Six of the nine states studied intensively focus almost exclusively on regulatory compliance, and rely on the specificity of the Title I regulations to prevent audit exceptions. We have called these state administrations "traditional."

The three other states, by contrast, have either modified the intent of their Chapter 1 efforts or their daily operation. One state, shortly before Chapter 1 passed, consolidated all supplemental programs. Another took the deregulatory intent of ECIA to heart, and for several years reduced monitoring and eliminated regulatory guidance to districts. The third shifted its focus from compliance to program quality after Chapter 1 passed, although the effects on districts visited is so far modest. In all three states, school districts have more responsibility for compliance than under Title I. We call these state administration "changing," although only two changed in response to Chapter 1. (The two clusters of states and factors influencing them are discussed in Chapter 3.)

In the absence of strong federal directions, we anticipate more diversity among states in administration, as state context and initiatives more strongly influence program management.

By and large, states have not shifted from regulatory compliance to quality programming. While all state directors express concern about high

quality programming, traditional Chapter 1 administrations assume a compliance strategy toward program improvement -- preferring program designs that are easy to monitor and having districts ensure the legality of new program designs. Program improvement activities rarely extend beyond the compliance focus. Changing Chapter 1 administrations are more likely to stress assistance rather than compliance to districts, for example by providing workshops or materials on exemplary practices. But districts in these states reported that the state Chapter 1 administrations played no role in their program design decisions, nor was it expected of them. (Chapter 5 presents an extended analysis of compliance and program improvement.)

Reductions in paperwork burden under Chapter 1 have been modest, partly because of uncertainty about the documentation needed for auditing and partly because states wanted information for their own monitoring. Fifteen of the 20 states reported no reduced paperwork in program application. The five states reporting a substantial reduction in the application shifted to a reduced narrative and required mostly assurances that appropriate procedures were followed, with back-up documentation in district offices. Some states saved time by no longer requiring comparability reports, although evaluation reporting remains unchanged. Overall, reductions in paperwork were seen as modest. (Chapter 2 discusses application approval, while Chapter 4 reports on paperwork reduction by administrative policy area.)

Among school districts, the overall paperwork burden, for the most part, was not eased, since documentation is required to be on file and evaluation reports are submitted to the state. In only two policy areas were reductions in paperwork noted -- comparability and parent involvement. Substantial reductions in paperwork were noted in districts that did not test for comparability but rather kept district policies on file. Moderate reductions were claimed by the large districts that tested comparability, primarily due to using student/staff ratios rather than per pupil expenditures in the calculations. The remaining medium and small districts had minor reductions in paperwork. The modest savings in paperwork for parent involvement came from reduced activities. (See Chapter 4 for further details.)

We found little evidence that Chapter 1 funds are used as general aid. Chapter 1 is a primarily compliant program. State and local Chapter 1

staff are committed to Chapter 1 intents, and many are veterans of Title I. State Chapter 1 administrators are a "visible presence" in districts to support local Chapter 1 staff and to remind district officials and principals that the legal framework must be followed.

Headline audit exceptions are largely a thing of the past. Where noncompliance occurs, it is on the margin, with little effect on the volume or quality of services provided to students. State and district Chapter 1 staff reported that exceptions can largely be traced to new superintendents or to new Chapter 1 directors unacquainted with nuances of the law, or to harried principals who may, for example, try to use Chapter 1 teachers as substitutes when faced with high absenteeism among regular teachers. Occasionally Chapter 1 aides may be asked to do general work, such as library duty. Some minimal noncompliance appears to be due to what school people believe is sound pedagogy, such as having Chapter 1 aides put up bulletin board material so that regular classroom teachers do not take time away from instruction.

Although not reported as noncompliance by Chapter 1 staff, AAI researchers found two instances where the number of noninstructional staff appears too large for the size of the program and Chapter 1 administrative staff spend less time on direct Chapter 1 services than they are paid for through the Chapter 1 budget. In one example, the practices may be technically legal, but both are questionable. While it is difficult to judge how many noninstructional personnel are needed to run a quality program, questionable practices may also result from breakdowns about what local monitoring is to include and from state monitoring that is too routinely done or too narrowly focused. (An extensive analysis appears in Chapter 5.)

Chapter 1 school and student selection requirements are reportedly well implemented in school districts, although local pressures to ensure that all eligible schools are served preclude concentration of services in the poorest schools. Procedures for targeting schools have altered very little from Title I to Chapter 1, in spite of initial concern that Chapter 1 would greatly expand the eligibility pool. States and districts reported reluctance to change procedures, not only owing to uncertainty about the new law, but because they are strongly committed to Title I as supplemental services for educationally disadvantaged students. (See Chapter 4 for details.)

The connection between administrative requirements and the quality of Chapter 1 programs is mixed. The requirements neither hinder nor encourage the development of high quality programs. Nevertheless, administrative policies, coupled with state certification requirements for reading teachers, have over the years helped to create a cadre of highly competent Chapter 1 teachers in many districts. In addition, a consistent finding from interviews with principals and regular and Chapter 1 teachers in most states was the strong opinion that Chapter 1 is part of an integrated continuum of services for low achieving students, not an uncoordinated, segregated program. (See Chapter 5 for further discussion.)

The contributions of evaluation and parent involvement requirements to Chapter 1 programming depend in large part on district influences. Federal evaluation requirements, starting with Title I, have helped districts develop evaluation expertise and have provided data for program officials, but they do not ensure that evaluation will be used to inform local decision making. District expertise and commitment to evaluation influence its involvement in programming.

Parents have seldom played as strong a role in programming as Title I had intended. Under Chapter 1, Parent Advisory Council (PAC) activities are markedly reduced with PACs continuing primarily in larger districts with a history of community participation in schooling. Some districts report that current parent activities, although smaller in scope, are more useful since they are more closely tied to student learning. Others remark that the absence of detailed language in the law has resulted in little activity past an annual informational meeting for parents. (Evaluation and parent involvement are discussed in Chapters 4 and 5).

FEDERAL POLICY OPTIONS

To ensure continuing compliance, the federal government should recognize the collaborative nature of state and district compliance monitoring, and support the experience, commitment and efficiency of the vertical network of state and district Chapter 1 personnel. Now that the compliance structure is in place, state monitoring activities serve less a fault-finding function and more a symbolic function -- a visible presence supporting district Chapter 1 staff and reminding other personnel that the

legal framework must be followed. In those instances where apparent noncompliance occurs, it seems to result from breakdowns about what local monitoring is to include and from state monitoring that is too routinely done or too narrowly focused. To counter such routinization, the federal government could encourage the use of alternative SEA monitoring mechanisms (such as consolidated monitoring, team monitoring, and district self-reviews); and promote random or spot-checking of district records rather than the review of nearly all documents we found in some states.

There appears to be no need to alter the 1 percent set-aside for state Chapter 1 compliance monitoring, provided the above activities are supported. Promoting the visible presence of SEA consultants in districts and the informal enforcement function of state and local personnel requires no additional resources, although some consideration could be given to increasing the "floor" allocation for state administration.

If Congress wanted to enhance state program quality efforts, two mechanisms are available: an increase in the state administrative set-aside or a multi-year discretionary grant program. The purposes of the two would be the same: to create program improvement expertise in states where it is lacking, and to enable staff with such expertise to offer it to school districts. Tying federal funding directly to program improvement makes it more likely that such activities will be pursued, unlike earlier efforts that encouraged but did not specifically earmark funds for SEAs to deal with program quality.

CHAPTER 2

STATE AND LOCAL ADMINISTRATIVE PRACTICES IN THE CHAPTER 1 PROGRAM

INTRODUCTION

This chapter has two major objectives:

- describing the administrative operation of the Chapter 1 program state education agencies and school districts
- identifying changes in administrative practices that have occurred since the passage of Chapter 1 legislation.

The following findings emerged from this study of administrative practices in the Chapter 1 program:

- A remarkable similarity and stability of administrative organization, staffing, and operations. Most SEAs and school districts reported little change in their organizational structure since Title I became Chapter 1. Staff tenure dates back to Title I. The more numerous organizational models at the local level largely reflect differences in district size.
- Considerable diversity in administrative services. The activities of administrative staff fell into similar categories across states and districts, primarily compliance assurance and improvement of program quality, but important differences existed in how activities were performed and which types were emphasized.
- A strong reliance on the judgment of professional staff, contributing to the diversity of administrative practices. In both SEAs and school districts, Chapter 1 professionals served as arbiters of regulatory compliance and, to a lesser degree, evaluators of program quality.
- Fairly substantial staffing decreases. These were attributed to constrained funds (at the SEA level, specifically the reduction in set-aside) more than to decreased administrative burden. Parent involvement specialists were the only staff cut due to legislative changes under Chapter 1.

- Reduced administrative services and/or increased workloads, but little rethinking of the overall direction of administrative efforts. A typical pattern was decreased SEA monitoring time in districts, with little change in areas covered and attention to regulatory compliance. Substantial changes in state application requirements or increased program improvement activities were rare.

In this chapter, we describe the institutional organization of Chapter 1 programs at the state and local levels, emphasizing changes that have occurred since Chapter 1 was passed.

STATE CHAPTER 1 ADMINISTRATION

This section describes the organization of state Chapter 1 programs, Chapter 1 program staffing, and SEA administrative practices -- monitoring, technical assistance, application review and approval, and rulemaking.

Chapter 1 staff in SEAs monitor local programs for compliance with federal (and state) rules and regulations; provide technical assistance to school districts; and review and approve applications for Chapter 1 funding. Within this fairly short list of responsibilities, states may choose among a broad range of administrative practices to implement their Chapter 1 programs, and may make their own "rules" to further regulate school district operation of Chapter 1 programs.

During the school year, state Chapter 1 staff spend up to four days each week in formal on-site monitoring, providing technical assistance, or "visiting with" (i.e., informally monitoring) districts. Over the course of a year, most state-level Chapter 1 staff spend 50 to 60 percent of their total work time in the field. Most Chapter 1 units designate one day each week as an "office" day when all staff are at the SEA. Staff meetings and other group events are then scheduled for this day. During the summer Chapter 1 staff spend most of their time in the SEA office reviewing school district Chapter 1 applications and planning workshops or meetings.

Organization of State Chapter 1 Programs

Overview. All 20 states in this study have operated federally funded compensatory education programs since the original Title I legislation was passed. Thus, many of their practices, priorities, and organizational

structures have evolved over some twenty years. Given the latitude of federal Chapter 1 regulations and the cultural/demographic differences among the 20 states in this sample, the similarities across 17 of them in Chapter 1 program organization, operations, and staffing are remarkable. These 17 SEAs have adopted a relatively simple structure in which each special program -- Chapter 1, for example -- forms a separate unit. A director (sometimes called a chief or supervisor) heads the Chapter 1 unit (agency/bureau) composed of generalist professional educators. A generalist is a staff member who is responsible for carrying out most of the program's key functions. In the case of Chapter 1, these functions include application review and approval, technical assistance, and monitoring.

As discussed in more detail later in this section, three SEAs have combined some or all of the main Chapter 1 functions with similar functions for other special programs. In one state, generalist staff continue to perform application review, monitoring, and technical assistance, but do so for all special and categorical programs; no separate Chapter 1 unit or Chapter 1 staff exists. Another SEA has consolidated monitoring across special programs but maintains a separate Chapter 1 unit for application approval and technical assistance. In a third SEA, the organization reflects both functional and content specialization; a unit is composed of staff with expertise in a specific curriculum area or functional area. Staff for Chapter 1 monitoring teams are drawn from several units, as are experts in technical assistance. The state maintains a core Chapter 1 staff for application review and approval.

In the 17 SEAs where staff are organized by program, the hierarchical structure tends to be quite flat. A few large SEAs have a supervisory layer, but in most of them all staff report to the Chapter 1 director. Staff members hold the same rank, with minor titular and salary differences that reflect years of service and professional credentials. Unit staff have various titles in different states, such as consultant, supervisor, or specialist. They are usually assigned responsibility for overseeing all Chapter 1 activities in specific school districts. Staff assignments are based on districts size. One staff member might be responsible for a single district or several might share responsibility for a very large district. Small and mid-sized districts are grouped into regions. Some states rotate

staff among regions to ensure uniformity of treatment and enforcement across districts.

Staff have considerable discretion about how they spend their time in districts, for example in determining compliance with particular regulations or the appropriateness or quality of classroom instruction. Chapter 1 regulations allow state and local interpretation of program rules and regulations so that compensatory education programs can be tailored to meet the needs of the state, the district, the school, and the children needing services. In addition, policy implementation in public schools necessarily involves discretionary decision making by implementors. This process, sometimes called street level bureaucracy, is well documented, particularly by Lipsky (1980). Hence, state staff need flexibility to use their professional judgement when reviewing school and district efforts. In a few states and districts, monitoring visits are conducted by staff teams (occasionally including non-Chapter 1 personnel). But in 11 of the 17 states, individual Chapter 1 staff monitored program activities in their assigned districts.

One of the three SEAs with a modified organizational structure can still be described as being organized mainly by program, but has consolidated monitoring of its categorical programs. Chapter 1 staff continue to be generalists in that they handle all other Chapter 1 activities for their districts, and also serve on monitoring teams for Chapter 1 and other categorical programs.

Staff in the two more functionally organized SEAs have professional specialties such as curriculum, reading, or compliance monitoring regardless of program served. One of these is distinguished by long-established horizontal "webs" of program staff. Organizational units specialize in subjects (for example, math, reading/English, bilingual) or managerial topics (finance, planning/program development). Each specialist works with various programs. Thus, compensatory education staff are subject and managerial specialists across programs. In addition, staff in a core compensatory education unit (which oversees Chapter 1 and state compensatory education) meet with specialists on program and policy issues, organize and lead monitoring teams (which include subject and managerial specialists), supervise

districts' technical assistance, review and approve applications, and handle district correspondence.

The second functionally organized SEA has created a structure for compliance assurance activities across all categorical programs. Before Chapter 1 took effect, the state consolidated its application form for nine programs, reorganized their administration and, in 1983, consolidated on-site program monitoring. One SEA unit handles applications and compliance monitoring for all programs; another is responsible for compensatory education policy and program development, while a third is in charge of program evaluation. Staff who had formerly monitored or provided technical assistance only for Title I programs were taken off the Title I budget and reassigned to a curriculum division to develop a general curriculum. Staff who work in the categorical program units can also be labeled generalists as they handle application approval, technical assistance, and monitoring across a variety of programs.

In summary, three points are worth noting about these two organizational models:

- State-level administrative organization and procedures were developed under Title I and have undergone little or no change since the passage of Chapter 1 legislation.
- The most common organizational form uses multi-function district visits. Most often, monitoring is carried out concurrently with technical assistance.
- State Chapter 1 programs rely heavily on the professional judgment of staff members. Because of the breadth of the generalists' responsibilities, they are the districts' chief interpreters of federal and state regulations and policies. Of course they are guided by federal regulations as well as by SEA-developed monitoring checklists and guidelines.

Location within the SEA. While there is considerable similarity of organization among many state Chapter 1 programs, Chapter 1 program location within SEAs is less uniform. For the 20 states in the AAI sample, the location of Chapter 1 SEA programs can be loosely grouped into:

- divisions of federal programs (six states)
- divisions of curriculum, instruction, or general education (five states)
- divisions of special programs, such as special education, compensatory education, special services (eight states)
- no separate state level Chapter 1 office (one state).

The hierarchical location of Chapter 1 within SEAs shows somewhat less variation. Chapter 1 directors fall between two and four levels below the Chief State School Officers (CSSOs). In states with large SEAs, where the CSSO has one or more assistants, the level below the assistant CSSOs tends to be division heads, to whom agency/bureau/unit heads report. In such a state, the Chapter 1 director is four levels below the CSSO. Elsewhere, the Chapter 1 director will be at the second or third level below the CSSO, reporting to a division or department head who reports directly to the CSSO.

Program Integration

Of the 20 states, six mandate school improvement programs and also have state compensatory education programs. Four of the six have integrated their school improvement, state compensatory education, and Chapter 1 programs. Two of these four states were described earlier. In these two, Chapter 1 is integrated across SEA functional areas, and there also appears to be some coordination among programs. In two other states, all compensatory education and school improvement programs are located within the same department, and there is a commitment in principle to administrative or program integration. In yet another state, these programs are located within different divisions of the SEA, with little integration.

Ten of the 20 states have instituted only school improvement programs, and four have neither school improvement nor state compensatory education programs. Six of the 10 states that have only school improvement efforts report that these activities are integrated with Chapter 1 program activities. Of the 16 states with compensatory education or school improvement initiatives or both, 10 states report some coordination across programs.

It is difficult in a short-term study to identify the nature and extent of program integration. Information gathered during interviews with state Chapter 1 staff suggests that there is some informal integration among programs. For example, where the Chapter 1 office is housed in the same division as special education, cooperative efforts ranged from sharing materials to joint curriculum development. However, field research teams could not verify program integration. We expect that it is more frequent in bureaucratic and procedural areas (joint use of applications, test results, and the like) than in curriculum and instructional matters.

There is some forced integration of staff across programs, reportedly due to recent resource constraints. In the six states where Chapter 1 is housed with other federal programs, Chapter 1 staff usually spend 10 to 20 percent of their time on non-Chapter 1 responsibilities. Salaries are proportionately assigned to program budgets. Thus, staff are retained, but FTEs are spread across programs.

In most states, it appears that integration of activities across programs is limited to administrative coordination, including joint applications or multi-program monitoring teams for site visits. Only occasionally does it include the coordination of curricula or instructional material. In fact, in some states, the Chapter 1 program seems to be stranded among semi-related federal programs. This isolation is increased by federal reporting requirements and accountability, which make integration with other programs difficult.

Chapter 1 Staffing in the SEA

Staff size. Staff sizes (in full-time equivalents) of state-level Chapter 1 organizations are reported in Table 2-1 as are average staff sizes for Title I programs in 1980-81. As the table shows, 15 states in our sample have fewer staff now than under Title I. Also, in each of four size categories, the average number of staff decreased.

State Chapter 1 directors interviewed during this study report that decreases in staff size since the passage of Chapter 1 legislation reflect reduced resources rather than legislative or regulatory changes due to the switch from Title I to Chapter 1. Chapter 1 directors in the 15 states reporting cutbacks indicate that changes in staff size are the direct result

of the federal reduction (from 1.5 to 1 percent) in state set-aside monies. "Floor" states, where the set-aside has remained the same (at $225,000), have also had to make staffing cuts because of inflation and mandated staff salary increases.

It is, however, important to note that while overall staffing decreases probably do reflect the fact that states have less administrative money, the areas (evaluation and parent involvement) in which state Chapter 1 programs have chosen to institute these staff cutbacks are the requirements most affected by legislative change. That is, given the revised Chapter 1 requirements, states could afford to decrease numbers of evaluators and eliminate positions for parent involvement specialists. The effects of the reduction in Chapter 1 administrative monies are discussed in detail in Chapter 3.

Table 2-1

Average Size of State Chapter 1 Offices, under Title I (1980-81) and Chapter 1 (1985-86)

States and Staff	Full Time Equivalents							
	5 or less		6 to 10		11 to 20		21 or more	
	TI	Ch1	TI	Ch1	TI	Ch1	TI	Ch1
Number of states	5	8	8	6	3	3	4	3
Average number of FTE staff	4.4	3.3	7.1	6.4	15.7	13.8	49.5*	41.9*

*N=2

Evaluation and parent involvement specialists. Constrained resources have led to cutbacks in specialist staff. In 1980-81 (under Title I), 18 of the 20 state Chapter 1 organizations had assigned at least one FTE

professional to the task of evaluation. In 1985-86, 16 states indicated that they had retained evaluation specialists. Currently:

- Seven states employ full-time evaluation staff (at least one FTE). Most of them employed several evaluators in 1980-81.
- Six states have part-time evaluation personnel (usually less than .5 FTE). Most of them had full-time evaluation staff in 1980-81.
- One state receives assistance from staff in another division of the SEA.
- Two states require their Chapter 1 staff generalist to handle any evaluation activities.

The number of parent involvement specialists has also been reduced. Of the 16 states reporting on this topic, seven had parent involvement specialists in 1980-81 and now have fewer or none. Only two of the 16 report the same number of parent specialists in 1985-86 as in 1980-81; the remaining seven have never employed parent specialists. Several of the state directors also estimate that generalist staff spend less time on parent involvement under Chapter 1 than they did under Title I.

Staff tenure. Most of the directors and staff in state Chapter 1 programs began their service under Title I and were trained within the Title I framework. Table 2-2 displays information on staff length of service in Title I/Chapter 1 at the SEA level.

Most of the states reporting indicated that they employ staff who have had some years of experience in the Title I program. Even in the four states showing an average staff tenure of less than five years, the current Chapter 1 organizations included at least one staff member who had worked with Title I. Interviews with staff in the 20 states elicited confirmation that many, if not most, Chapter 1 personnel possess a strong grounding in the Title I program.

Table 2-2

Average Years of Service of
State Chapter 1 Directors and Staff
1985-1986

Staff and Directors	Years of Service		
	5 or less	6 to 10	11 to 20
Staff Tenure			
Number of states (N=15)*	4	8	3
Average tenure	2.7	7.8	12.8
Tenure as Directors			
Number of states (N=19)**	10	3	6
Average tenure	2.3	8.0	13.3
Directors' Total Tenure in Title I/Chapter 1			
Number of states (N=19)**	2	3	14
Average tenure	4.5	9.3	16.0

*15 states reported data on staff tenure.
**In one state, the Chapter 1 directorship was vacant during data collection.

Many SEA Chapter 1 staff also have classroom or district administrative experience in the Title I or Chapter 1 program. Others have conventional classroom and/or local administrative experience (as elementary

school principals, for example, or as curriculum or reading specialists in district central offices). More recently hired SEA staff tend to have expertise in such areas as reading, curriculum development, school improvement or effectiveness, and evaluation. Recently hired generalists appear to have stronger instructional backgrounds than longer-term staff. Directors in states that reported increased technical assistance or program improvement activities generally stressed the content expertise of newer staff, but SEAs rarely appeared to build on the background of their new staff to expand their unit's overall program improvement capabilities. Most new staff are being trained for the traditional compliance assurance roles of generalists. The long-term state staff -- and, anticipating our discussion of districts, long-term local staff -- are credited with increasing efficiency in compliance related activities.

SEA Practices and Changes in the Chapter 1 Program

This section briefly describes specific state-level Chapter 1 program operations. Current administrative practices are noted, and operational differences between Title I and Chapter 1 are identified. The discussion is organized around state-level Chapter 1 responsibilities: approving and reviewing district applications for Chapter 1 funds; monitoring local Chapter 1 programs for compliance; providing technical assistance to school districts. State rulemaking is also considered. Detailed descriptions of these administrative practices, and of auditing functions performed by non-Chapter 1 staff, can be found in the appendix volume of this report.

Application approval. Chapter 1 regulations require that school districts submit applications for approval by SEA staff before they can receive funds. Eleven states require annual applications; nine require applications every three years with an annual update. Except in the one state with a combined categorical program application, SEA staff review the applications of the districts assigned to them, using SEA checklists. In some states, financial unit staff assist in reviewing budgets. Many states require state Chapter 1 directors' approval of applications, although most give substantial autonomy to individual staff members.

Because Chapter 1 reduced requirements and allowed districts to submit assurances -- statements that they would comply with requirements --

instead of detailed documentation, researchers expected a significant reduction in time spent on application review and approval. But most states (15 of 20) report no major changes in administrative burden in this area. Of the five states shifting primarily to assurances, the paperwork burden was substantially reduced. The perceived reductions were somewhat offset by staff being responsible for more districts through the reduced set-aside. Overall, in the applications themselves, noticeable change occurred in only two sections: 19 of the 20 states now accept assurances from school districts on comparability requirements; and submission of documentation on parent involvement has mostly been eliminated.

There appear to be several reasons for the lack of change in burden. First, SEA staff in some states report that although it is no longer required, school districts still submit comparability documentation, which SEAs say they review as they did during Title I. In most states, documentation, though no longer submitted, is still to be kept on file for auditing purposes. Some states check the documentation during monitoring -- thus simply transferring the administrative burden to the monitoring task. In other states, particularly in the rural ones, small districts were not required to submit comparability documentation even under Title I; thus, there has been little or no change in staff activity.

A second explanation is that 18 of the 20 states continue to require districts to submit detailed poverty statistics for attendance areas, and 14 states still require that they submit achievement test results by subject and grade level.

Third, in states continuing to require that district applications include documentation and program descriptions, applications remain the basis for monitoring and enforcing district compliance with regulations. During monitoring visits, information from the application is compared with expenditure records and data on program design. Thus, because applications serve as "contracts" (and are also used by fiscal auditors), staff accord them careful and time-consuming review.

Most districts saw no significant reduction in state application requirements. As with other staff responsibilities, it proved difficult to obtain reliable estimates of staff time spent on application review and approval.

Monitoring. States monitor local Chapter 1 programs to verify compliance with requirements; to determine congruence between applications and programs; and to assess the quality of the educational services.

AAI researchers found substantial similarities in monitoring procedures across the 20 states. All of these states:

- follow a formal monitoring cycle
- use a checklist (or similar instrument) to determine compliance
- review on-site "documentation" (material in district central office files)
- demonstrate little change in practice since the passage of Chapter 1 legislation; one modification appears to be slightly less time spent reviewing documents.

Twelve of the states in the AAI sample monitor their districts at least once every three years. Their formal (published) monitoring schedules call for triennial on-site monitoring, but many of them monitor "problem" districts more frequently. Two states monitor all districts annually; five states monitor biennially. With the passage of Chapter 1 legislation, one state moved from a three-year to a five-year monitoring cycle. Nine of the 12 states on a triennial cycle report more frequent (usually annual) monitoring of their largest districts.

While states appear to make a strong effort to meet their formal monitoring schedules, unexpected events (the Felton decision, for example) can disrupt schedules. Also, most state Chapter 1 programs permit staff to exercise some discretion in their scheduling, which allows giving priority to problem districts that show low achievement gains or were previously out of compliance.

Two states have established monitoring teams who review Chapter 1 along with a range of other categorical programs. Seven other states also use monitoring teams; but these teams are led by the Chapter 1 staff member assigned to the district and review only the Chapter 1 program. In the remaining 11 states, the staff assigned to each district conduct the formal monitoring visits.

Average time per visit is displayed in Table 2-3. Time on site varies, usually by size of district. In some small districts, monitors spent as little as half a person day on monitoring, while in one of the largest metropolitan districts they spent between two and three person days each week of the school year. With paperwork and follow-up, this means that such staff spent all their time on monitoring activities. In two states with monitoring teams, at least four SEA staff spend between three and five days per district -- at least 12 person days for each formal monitoring visit, with larger districts receiving longer visits.

Two states in this study have cross-program monitoring of all federal and state categorical programs; thus, staff could not estimate time spent only on Chapter 1 visits. Comprehensive monitoring requires from 12 to 80 person days, varying with district size. Data on these two states are not included in Table 2-3.

Table 2-3

Comparison of Monitoring Frequency
with Average Time on Site, by State*

Monitoring Frequency	Average Time on Site (person days)**			
	1 or less	2 - 3	4 - 6	18 or more
Annual	0	1	1	0
Biennial	1	3	0	0
Triennial	6	1	2	2

*17 states provided information on this topic.
**The largest metropolitan districts in the state are excluded from these calculations. They are often visited for extended periods by teams of SEA staff and therefore would distort the average.

Given the emphasis many states place on monitoring for compliance with Chapter 1 requirements, the rather short time per visit may seem surprising: six states spent one person day or less on site every three years. Time on site reflects two factors: the number of districts in a state

and the size of the state's Chapter 1 staff. The number of staff available for monitoring obviously depends on the size of the state's allocation. The number of districts depends on a variety of historical and political factors. Thus there is considerable variation from state to state. The six states reporting triennial visits of one person day per district or less are rural, with numerous small districts. In addition, staff in some rural states spend significant time traveling to and among districts.

States with fewer districts and short formal monitoring visits spent additional time on site in "interim" monitoring, usually focused either at the school level or on problem areas flagged by the local Chapter 1 coordinator or noted during formal monitoring visits.

Table 2-4 presents changes in monitoring frequency and time-on-site since the passage of Chapter 1. Five of the 14 states reporting a decrease in monitoring frequency or time on site attributed the reduction to decreases in staff.

Table 2-4

Number of States Changing
Monitoring Frequency and Time on
Site, 1980-81 to 1985-86

Monitoring Frequency	Time on Site*		
	Decreased	Did not Change	Increased
Decreased	1	3	2
No change	5	3	0

*14 states provided information on this topic.

On-site monitoring activities also vary across and within states. Some monitors use checklists and other guides. Some devote their visits to reviewing central office records and interviewing administrators. Others observe classroom activities, interview Chapter 1 teachers and principals, and attend PAC meetings. File review can be cursory -- simply noting that documentation exists -- or can involve recalculation of comparability data and detailed review of the criteria for ranking students. Thus, while checklists are a state-level effort to ensure uniformity in compliance monitoring -- and their use appears to have led to some standardization -- Chapter 1 effectiveness at the state level remains heavily dependent on the judgment, interest, discretion, and expertise of SEA staff.

Variation in monitoring practices becomes more pronounced with regard to monitoring for program quality.* Of the 20 states, 14 reported that their primary purpose in monitoring was to check district compliance with regulations, but seven of them noted that staff particularly interested in instructional improvement looked at quality when they had time. Five states said that district compliance and quality were given relatively equal weight; one state emphasized monitoring to ascertain program quality.

Not surprisingly, definitions of what constitutes "monitoring for quality" are not uniform across states or among monitors within states. Sometimes, state Chapter 1 staff gave precedence in their monitoring schedules to districts with low achievement gains, focusing on instructional strategies or program design. In other states, monitors chose to emphasize such items as student/teacher ratios. Monitoring for quality includes review of lesson plans and classroom observation, which clearly could serve also for compliance monitoring. Some state staff even define program quality in terms of regulatory compliance.

Districts were asked about SEA monitoring practices. While their reports did not clearly confirm or contradict state information, district coordinators indicated that reductions in state monitoring activity since the passage of Chapter 1 were of minimal consequence. Although SEA staff in seven

---

*Program quality is defined by the individual states. AAI field staff did not try to arrive at a consensus definition.

of the nine states in which districts were visited reported less monitoring time on site, only nine of the 26 districts reporting noted a reduction, and all but one of these considered the reduction to be minor. However, in every state reporting reduced monitoring time, at least one district perceived some reduction.

Districts reported the focus of monitoring to be mainly compliance and only rarely program quality. What little change was reported in the areas covered, was generally attributed to changes in the state staff.

Technical assistance. AAI researchers asked how much time state Chapter 1 staff, particularly the generalists, spent in monitoring versus giving technical assistance. They also tried to determine how much change there had been in the amount and kind of assistance and the emphasis on assuring compliance versus improving program quality. Previous research had indicated that in most states, technical assistance had decreased significantly, and had shifted from compliance to program quality issues since Chapter 1 took effect, suggesting a shift in state emphasis (Dougherty, 1985).

Estimating the proportion of staff time devoted to technical assistance was virtually impossible because on-site and over-the-phone assistance could seldom be disentangled from monitoring. A single visit or conversation often served both purposes. If problems were discovered, SEA staff wanted to help resolve them immediately. Fourteen states specifically mentioned the use of monitoring visits to provide technical assistance.

States that attempted estimates gave figures ranging from 13 percent to 50 percent of staff time spent on technical assistance. Researchers generally noted that staff appeared to spend more time monitoring than providing assistance.

Of 16 states reporting, seven indicated that the time they spent on technical assistance had decreased since Chapter 1, five others said that it had increased, and four that it remained the same. Decreases were attributed to reduced resources. All five states that increased technical assistance said that they now spent less time monitoring. One state gave relaxed requirements under Chapter 1 as the cause; the others chose to shift from monitoring to technical assistance for state-specific reasons such as a change in the orientation of the director.

The ways in which technical assistance was given were much the same as reported in previous research (Dougherty, 1985), including assistance during monitoring, phone calls and memos, state and regional conferences or workshops, and specialized in-service to individual (or small groups of) districts at times other than monitoring visits. Sixteen of the 20 SEAs conduct state or regional conferences or workshops at least once a year. Half of the states report providing technical assistance during district in-service days.

No general shift, such as might be expected with declining resources, to less tailormade technical assistance was found. At the same time, only limited specialized in-service to single districts or small groups of districts at times other than monitoring was reported. Most "personalized" technical assistance occurred during monitoring, over the phone, or in writing.

As for the focus of technical assistance, the fact that much of it takes place during monitoring visits made it difficult to separate compliance-related assistance from program quality activities. State staff might report that they offer assistance to "improve quality," but when asked for examples, seldom related any exchanges with district staff that touched on areas such as instructional strategies, curriculum development, or ways to address the needs of disadvantaged children. Instead, they mentioned helping districts comply or more easily demonstrate their compliance with regulations. Whether compliance or quality was emphasized also seemed strongly influenced by differences in staff background, especially content expertise, as previously discussed.

Ten states focus their technical assistance on compliance issues; six report technical assistance primarily for program quality; and the other four report that it focuses on both compliance and program improvement. In 12 states, recent conferences or workshops offered parallel sessions on compliance issues (application preparation, for example) and on program improvement (for instance, exemplary practices).

Nine states reported that they now offer more technical assistance for program improvement, but only one of them specifically attributed this increase to regulatory change under Chapter 1. However, several states did shift from technical assistance on compliance with parent involvement

regulations to assistance on issues of instructional quality after Chapter 1 eliminated PAC requirements. This shift must be considered a reflection of regulatory change.

In summary, although change was found in state technical assistance practices, it was not as significant as reported by previous research.

District reports were at variance with state reports of technical assistance. None of the states in which districts were visited reported increasing technical assistance since Chapter 1 had passed. Four reported decreases and the remainder no change. Nevertheless, all the SEAs indicated that Chapter 1 staff were available and offered assistance, at least during monitoring and over the phone. All indicated that they offered significant assistance. Half indicated some assistance for program quality.

District reports indicated that districts think their SEAs offer considerably less technical assistance than state reports would suggest. Eight districts in three states reported little or no assistance. Six additional districts in five states reported greater expertise at the district than the state level, primarily because state salaries were lower than those of the districts. Most of these were larger districts.

In the 12 districts from eight states where district staff characterized the state as "available" or "helpful" in providing technical assistance, the amount given was modest. Half of these districts noted some attention to program quality. However, the instances they cited usually represented clarifications of regulatory matters. For example, a state monitor pointed out a subtest score that could have been used to qualify a student for Chapter 1. Some districts remarked on the usefulness of workshops on application preparation. District staff rarely remembered being given advice about program development or instructional strategies. Although several states reported offering workshops or conferences on program quality, only one district mentioned these as especially helpful.

Rulemaking. Beginning in 1983, the Chapter 1 legislation allowed states to make formal or informal rules. A formal rule is one that is made through a legislative, quasi-legislative, judicial, or quasi-judicial process. An informal rule is expressed as guidance, or in handbooks, memoranda, or application requirements.

It appears from the qualitative data collected that all SEAs make rules, mostly informal ones, to carry out their Chapter 1 responsibilities. SEAs generally do not call this activity "rulemaking"; they speak of providing guidance or issuing recommendations. It is often difficult to distinguish informal rulemaking from technical assistance.

That "guidance" often means a "requirement" was explicit in the following SEA comments on a district application: "State guidelines call for 2½ to five hours per week of instruction for each subject matter area. A 40 minute period, 3 times weekly does not meet this requirement." This state said that it uses "recommendations" rather than "rules."

Because Chapter 1 initially relaxed some stringent Title I requirements and permitted state rulemaking, states were expected to institute new rules to fill the void or to delegate more rulemaking authority to districts. In fact, they did neither. Because of the vagueness of the Chapter 1 language, states feared that district auditors or federal monitors might disallow new practices and thus continued to follow Title I. As several state directors noted: "We knew the Title I regs were legal." Some state Chapter 1 directors expressed relief at the appearance of the Chapter 1 Technical Amendments and Nonregulatory Guidance intended to clarify state Chapter 1 responsibilities.

In general, regulations that had been considered cumbersome and of little use -- for example, those on parent advisory councils and calculation of per pupil expenditures for comparability -- were relaxed. However, when regulations served SEA or district interests, the SEAs "informally" required continuation of Title I practices. For example, most states retained district use of TIERS Model A for evaluation. Title I procedures were well institutionalized and any change would have demanded substantial SEA and district staff time. Also, evaluation data had proved useful in touting successful programs, maintaining funding, and identifying problematic school districts.

Seven of the 27 districts believed that guidance from the SEA helped them to comply with federal requirements. While district coordinators do not always clearly distinguish between state and federal requirements, they reported that they did not view state rules or guidance as going beyond federal regulations. Most local Chapter 1 coordinators considered it

appropriate state guidance. Problems arose, however, when state Chapter 1 directors or staff forced changes in local program designs or stifled attempts to develop new programs so as to avoid compliance violations.

Eighteen of the 27 districts indicated that the state Chapter 1 units developed procedures to ensure compliance and prevent audit exceptions. For the most part, districts could determine their own educational programs provided they remained within the bounds set by the states.

In five states, some Chapter 1 district coordinators stated that the SEA "maintained Title I" or informally required Title I practices. However, local coordinators were not uniformly aware of which rules had changed under Chapter 1. State requirements and changes related to specific Chapter 1 regulations (e.g., comparability) are discussed in Chapter 4.

LOCAL CHAPTER 1 ADMINISTRATION

The administrative organization, practices, and changes reported by the 27 school districts are described in the remaining sections of this Chapter. Chapter 1 administration in school districts of all sizes encompasses primarily two major responsibilities: ensuring that the local program complies with federal, state, and local regulations; and providing support to Chapter 1 instructional staff. We first consider the organization of local programs; then the location of Chapter 1 within the district organization; next, administrative staffing; and last, the changes in administrative practices under Chapter 1.

A Note on District Size

Researchers visited three school districts in nine states, a total of 27 districts. In each state, an AAI team visited a large, a mid-size, and a small district. To draw this sample, large, medium, and small districts had to be chosen on a state by state basis. That is, although large districts were to have enrollments of 33,000 or more, the largest district in one rural state had an enrollment of 3,400. Thus, district sizes were not comparable across the sample.

Because administrative differences stem from size, we had to recategorize the districts as follows:

Small:	enrollment under 4,400 allocation under $550,000
Medium:	enrollment 5,000 to 13,000 allocation $600,000 to $2,400,000
Large:	metropolitan population over 240,000 enrollment 31,000 to 113,000 allocation $5,300,000 to $23,000,000.

When these 1985-86 criteria are applied to school districts in the AAI sample, ten districts qualify as small; nine as medium; and eight as large.

Organization of Local Chapter 1 Programs

District Chapter 1 administrators must implement local programs as described in their funding application and in keeping with federal and state regulations. They must ensure compliance in the schools. They monitor program operation, inform staff of required practices, and see that requirements are met. In addition, district administrators document and monitor district staffing patterns, expenditures, student selection, and other procedures. Finally, they prepare the Chapter 1 application, determine student eligibility cutoff criteria, select schools, and set a range for class size and instructional time. Often other central office or school-level personnel are involved in these tasks.

Unlike the state Chapter 1 staff, local administrative units typically provide Chapter 1 teachers with support to improve program quality. They develop classroom resources and curriculum, visit classrooms to monitor whether instructional objectives are addressed, suggest ideas to staff, and arrange for in-service training.

Support activities were more readily distinguished from compliance-assurance activities than at the state level. At the same time, some activities serve both compliance and program improvement. For example, a technical assistance visit to help a teacher with instructional strategies might also provide the local staff with information about whether the teacher's use of a Chapter 1 aide violates general aid provisions. And

teacher lesson plans might be reviewed for either program quality or compliance purposes, or both.

Estimates based on staff titles and specializations in districts with more than one administrator suggested that from 50 to 75 percent of the Chapter 1 administrative budget goes to instructional support. However, some districts appear to spend virtually all their funds on compliance assurance while others spend them on instructional support. Districts have considerable discretion in allocating time to either set of or activities. Their decisions are influenced mainly by district priorities and SEA demands. No minimum level of FTE compliance assurance activity seems to be required.

In virtually all districts some administrative time from non-Chapter 1 funds is contributed to the Chapter 1 program. The amount and focus of this contribution differs across districts. Most contributions, some of them substantial, seem to go toward instructional support -- for example, participation of Chapter 1 teachers in district in-service, or curriculum development. The AAI study was not designed to estimate such local contributions systematically; therefore, the following discussion concerns Chapter 1-funded administration.

Local administrative complexity and staff size and specialization are strongly related to district size. In addition, if the SEA integrates functions across program lines, school districts in that state display similar integration. Likewise, if special and compensatory education are located in the same SEA unit, they tend to be co-located in the districts as well.

Nevertheless, Chapter 1 organization at the local level varies more than among the SEAs in the sample. Four organizational types have been identified:

- part-time generalist
- simple differentiated
- complex differentiated
- functionally integrated.

Each type is briefly described below. The number of districts in each category is shown in Table 2-5.

Table 2-5

District Size and Chapter 1 Organizational Type

District Size	Number of Districts With:			
	Part-Time Generalist	Differentiated Simple	Differentiated Complex	Functional Integration
Small	9*	0	0	1
Medium	2*	4	2	1
Large	0	1	6	1
Total	11	5	8	3

*Two small districts and one mid-size district employ full-time "generalist" Chapter 1 coordinators.

Part-time generalists: doing it all. In seven of the ten small and one of the nine medium-sized districts, Chapter 1 is administered by a coordinator who is funded half-time or less by Chapter 1 -- the "part-time generalist." Although part-time coordinators acknowledged the importance of support staff who help with paperwork, most describe their jobs as "doing everything" needed to administer Chapter 1.

Two of these eight administrators coordinate virtually all district activity related to instruction; a third handles all responsibilities of Chapter 1 and special needs instruction; a fourth supervises reading, English, and teacher in-service training. These four coordinators clearly concentrate on instructional support. As might be expected, their training and experience has been in program quality and improvement. The other four coordinators focus primarily on compliance assurance for Chapter 1 and other federal and special programs, reflecting their training and experience.

How much time is devoted to compliance assurance versus instructional support is impossible to estimate with any confidence; as described by coordinators, Chapter 1 tasks in the part-time generalist districts take "only a little" time.

The Chapter 1 programs with part-time coordinators are small ones. Five districts serve fewer than 250 students; four districts serve 250 to 550 students, and two serve 800 to 850 students. The size of the instructional staff, including paraprofessionals or aides, ranges from four to 22 FTEs in the small districts, with five of the seven districts having ten or fewer FTE instructional staff. The medium-sized district has 33 FTE Chapter 1 instructional staff; it is not the smallest of the medium-sized districts.

Two other small districts and one mid-sized district have full-time coordinators who administer Chapter 1 in the same way as the part-time generalists. The difference, of course, is that they administer only Chapter 1. Two of these coordinators are strongly oriented toward instructional support; the third emphasizes compliance.

Simple differentiation: adding content specialists. Simple differentiation in district Chapter 1 organization occurs with the addition of at least one educational professional who specializes in instructional support. In this organizational type, either additional staff assist the coordinator in instructional support, or compliance assurance and instructional support activities are divided between two staff at the same professional level. In these districts, between 50 and 90 percent of professional administrative FTEs are assigned to these specialist positions, with the balance allocated to the coordinator.

In most of these organizations, the coordinator sees to most of the compliance related activities. Nevertheless, there seems to be no sharp division of responsibility. Most coordinators devote some time to instructional support, including visiting classrooms; and instructional specialists sometimes monitor for compliance. Some specialists act mainly as liaisons to school based staff; others manage instruction and in-service training for the entire district. None of the specialists in this sample has direct classroom responsibilities. All have degrees and training or experience in such content areas as reading or early childhood education.

Specialists may report to the coordinator, or they may hold the same rank as the coordinator with both reporting to another supervisor, frequently the head of the division of instruction. In the one large district with this type of organization, the specialists report to an instructional director who is at the same organizational level as the Chapter 1 coordinator. The

director reports to the head of the division of instruction, while the Chapter 1 coordinator reports to the head of the division of federal and special programs.

Four of the nine medium-sized districts and one of the eight large districts use this type of organization. In two medium-sized districts, a part-time coordinator and a part-time instructional specialist are budgeted for a total of 1 FTE. In the other two medium-sized districts, the coordinator and specialist are each full-time. The large district allocates .8 FTE for administrative coordination and 7.9 FTEs for instructional support.

Total enrollment in the mid-size districts ranges from 6,000 to 11,000. These districts serve from 870 to 2,400 Chapter 1 students, employing from 19 to 23 instructional staff. The large district serves 14,000 Chapter 1 students with 140 instructional staff.

Complex differentiation: adding administrative specialists. The third type of administrative organization has added at least one further professional whose focus is not instructional support.

Staffing configurations vary considerably among districts. In addition to school liaisons for instructional support, some of the largest districts have monitoring specialists checking schools for compliance. In some districts, Chapter 1 funds support budget specialists or public information disseminators who inform school personnel and parents about Chapter 1. Supervision of school monitors, budget monitoring, and dissemination might be assumed by an assistant director or distributed among two or three administrators, depending on district size.

As district size and complexity increase, coordinators assume more managerial roles -- keeping contact with the SEA and district departments as well as supervising other central office Chapter 1 staff with compliance responsibilities. They typically spend little time in schools. Often an instructional supervisor, who in some districts reports to the Chapter 1 coordinator and in others to the director of instruction, coordinates and supervises instructional specialists. Most Chapter 1 coordinators in these districts are budgeted full-time as Chapter 1 staff and spend most of their time on Chapter 1. A few also coordinate other, smaller programs, such as the state compensatory education program or migrant education.

One coordinator who has little managerial responsibility is an exception. In this district, a locally funded associate superintendent manages the program and delegates managerial responsibilities to another locally funded administrator. The Chapter 1 coordinator monitors schools and supervises additional monitors, fits the application format t. state guidelines, and performs compliance related tasks that are assigned to Chapter 1 specialists below the coordinator in other complex districts.

Two mid-size and six large districts use this type of administrative organization. One mid-size district serves about 1000 Chapter 1 students and has 4.5 FTE administrators and 30 instructional staff. The other serves 2,000 students with 5.5 FTE administrators and 100 instructional staff. The larger districts have from 4 to 45 FTE administrative staff, serve from 2,000 to 36,000 students, and employ from 60 to almost 1,000 instructional staff.

In four of these districts, staff liaisons are assigned a specific number of schools -- usually 16 to 17 per staff member. The other four districts assign staff by specialization or grade level.

Although in two of these districts instructional support activities appear to take 25 percent or less of administrative time, in the other six, instructional support specialist positions comprise between 50 and 75 percent of the FTEs allocated to administration. The remaining time goes to compliance and other general administrative activities.

Functional integration: joint administration of all federal and special programs. As noted in the discussion of Chapter 1 organization at the state level, one SEA in this sample uses a consolidated application form for all state and federal categorical programs. All programs are monitored by the same SEA team during a single visit. Not only is the administration of Chapter 1 coordinated with that of other federal and special programs, but administrative responsibilities for Chapter 1 are not separable from other federal and special program activities.

In the small and medium-sized districts in this state, Chapter 1 supports no additional administrative staff. In the large district, three central office staff handle all programs on the consolidated application, and nine content specialists act as school liaisons, providing instructional support specifically for Chapter 1 personnel.

Instructional Decision Making: Central Office Versus School

School districts vary in the degree to which control of the Chapter 1 instructional program is centralized. In some districts, central office policies dictate much of the design of the Chapter 1 program. These policies are additions to, or interpretations of, state and federal Chapter 1 regulations. They may be determined by the Chapter 1 coordinator or other central office staff, union contracts, district traditions, or the school board.

One large district visited, for example, has highly centralized control, recently increased by the adoption of a districtwide curriculum for the regular instructional program. The Chapter 1 coordinator and district Chapter 1 staff likewise control the Chapter 1 instructional program, and Chapter 1 teachers cannot choose any material: even ditto sheets are approved at the district office. Other aspects of program design are also centrally controlled; for example, all schools use the pullout model.

In other districts, the balance of control over both design and implementation lies with the schools. The strongest example of school-level control in the AAI sample is a district system that has no single coordinated curriculum for the regular program or even a coordinated report card system for all schools. Within federal and state Chapter 1 guidelines, the schools control Chapter 1 program design and staff; instructional content; size, scope and quality matters; student selection; and program management and supervision.

In most districts, the central office sets certain bounds within which the schools may adopt the designs or implementation strategies they choose. Depending on these bounds, the balance of control may lie with either the central office or the schools. Central and school-level administrators reported that that balance is influenced by who makes budget and staffing allocation decisions; who hires, supervises, and evaluates Chapter 1 staff; and whether districtwide curricula (for the regular and/or the Chapter 1 program) are used.

Although in some districts principals were involved in budget and staff allocation decisions, these were generally controlled by the central

office. On the other hand, in most cases, principals were involved in the hiring of teachers. In the large majority of cases, teachers and aides reported to and were evaluated by principals (as opposed to Chapter 1 central office staff). Principals were most often the first line of supervision for the program.

There was considerable variety in curriculum decision making, but most districts had no districtwide Chapter 1 curriculum. Although Chapter 1 administrative staff were involved in curriculum development and staff development, teachers were likely to have considerable influence over the curriculum or training offered.

Certain Chapter 1 regulations apparently increase central office control. Both central office and school administrators frequently cited the fact that the central office staff select schools for the program in order to meet targeting requirements. In most districts the central office controls student selection. Many central offices required or strongly preferred certain program models, though principals in a small but surprising number of districts decided whether small group instruction occurred in pullout or regular classes.

In addition to formal policies and structures, the balance of control was influenced by informal decision making at lower levels. As noted by Weick (1976), the relationship between district central offices and schools is usually one of "loose-coupling" rather than tight control from above. A gap exists between formally stated policies and those actually put into practice, because implementation involves considerable informal policy making (Lipsky, 1980).

In one district, for example, researchers spoke with teachers who said that they preferred their own materials and used them instead of the districtwide curriculum. In another, in which the student to instructor ratio was set by the central office at 23 to 1, staff in one school reported ratios that were considerably higher, including one teacher with 37 students for whom she provided individual or small group instruction. Reporting on a third district, researchers wrote, "Whether the district realized it or not, many administrative decisions were being made by the principal of this school." For example, the principal had no intention of consolidating two Chapter 1 instructional components in spite of a central office policy to merge them.

The Chapter 1 Coordinator's Role

The coordinator's role in decision making is perhaps most visible when the program design is changed. As described later in this chapter, substantial change was the exception rather than the rule in district program designs. Although AAI researchers were not in districts long enough to explore district decision making fully, some comments can be made.

The role of the Chapter 1 coordinator in instructional decision making is affected by the locus of control in the district and the coordinator's position in the central office hierarchy.* The coordinator in the district with strong central control described in the preceding section, for example, said that there were no changes she wanted to make in the program design, but if she wanted changes she would make them. In the district in which the balance of control lay clearly with the schools, the role of the Chapter 1 coordinator and other central office staff was viewed as one of support and assistance for decisions made at the school level.

District Chapter 1 coordinators were most often located two levels removed from the superintendent, reporting to an assistant superintendent. In three large districts, the coordinator was three levels below the superintendent. Because of their formal power, central office administrators above the coordinator often strongly influence policy decisions -- including those specific to Chapter 1, such as program design. Coordinators must follow the lead of the higher-level administrators.

Coordinators in one small and one medium-size district were assistant superintendents for instruction and thus had more power. Coordinators with strong instructional backgrounds, particularly those in the "part-time generalist" districts with responsibilities for the regular instructional program, could argue for particular designs on the basis of their instructional expertise.

---

*Although in the AAI sample all coordinators but one were central office staff, school principals and teachers may serve as Chapter 1 coordinators in very small districts. This discussion assumes that the coordinator is a member of the central office staff.

Chapter 1 coordinators usually had approval power over program changes desired by principals and teachers (at times subject to higher-level administrative review); but in most districts it appeared that principals and teachers initiated the changes. Furthermore, when change had come from the central office level, it was generally because of decisions made by superintendents or assistant superintendents. In three districts, including the example of centralized control described above, at least some aspect of the change stemmed from the superintendent's implementation of court orders in civil rights cases.

Central office control over budget and staffing allocations is a key element in its overall control of the program. Coordinators vary in their power to determine these allocations. Some appear to develop the budget and then assign staff or staff positions to schools with only a pro forma sign-off by higher-level officials; at the other extreme, they may simply formalize on paper (particularly the application and budget monitoring documents) decisions that are made by other officials.

Typically, the coordinators' role was to ensure that both allocation decisions and changes in program design or instructional approach met regulations, that resources were shifted in accordance with policy decisions, and that any necessary paperwork was completed. The coordinator often mediated or negotiated not only vis-a-vis the SEA but also in relation to higher-level district administrators, principals, Chapter 1 instructional staff, and parents. The coordinator had to maintain a good fit between district policies and instructional philosophies, federal and state regulations, and the instructional orientations of school-level staff. Chapter 1 regulations, and visible SEA support for them, served in some instances to enhance the coordinator's limited leverage in such negotiations.

As described in Chapter 3, the orientation of the Chapter 1 coordinator can influence district Chapter 1 administration and program design. The "negotiating" and mediating" function allows considerable scope for informal influence.

Coordination with Other Programs

In five of the large districts and 16 of the medium and small districts, Chapter 1 coordinators are assigned to instructional divisions and

usually report to division directors. In five other districts (two large and three medium), they report to directors of divisions of federal (or federal and other special) programs. In one large district, Chapter 1 coordination is divided functionally between one person in an instructional division and another in an administrative affairs division.

Of the Chapter 1 coordinators who have responsibilities other than Chapter 1, most manage other federal and special programs, such as state or local compensatory education, migrant education, and Chapter 2.

Exceptions among the part-time coordinators, four of whom carry conventional program responsibilities, have been noted. One coordinator in a mid-sized complex district is the district director of instruction. Only a small part of her salary is paid from Chapter 1, and two full-time administrators report to her and carry most of the central office administrative workload for Chapter 1.

The types of decision generally controlled at the school level affected coordination of programs as delivered to students. In all but one district, principals determined the scheduling of Chapter 1 instruction, which was generally considered an implementation rather than a policy decision that affected the balance of control only slightly. However, scheduling often had a considerable effect on which part of the regular instructional program or other special programs Chapter 1 students could attend.

How regular classroom teachers communicate with the Chapter 1 staff -- in writing or verbally, on a schedule or during breaks and lunches -- is often as much a school-level as a central office decision. In some cases, the Chapter 1 coordinator requires, for example, that some communication be in writing, but allows the school to determine what type and how much written communication is necessary.

Staffing

Administrative staff changes since Title I. Staffing levels have decreased in 11 of the 17 districts for which information was available. This includes four "part-time generalist" coordinators with cuts ranging from 30 percent (.15 FTE) to 67 percent (1 FTE) of the total FY81 FTEs. Professional FTEs for administration decreased by half in two "simple differentiated"

districts. In the five "complex differentiated" districts in which administrative FTEs decreased, cuts ranged from 22 percent (1.25 FTEs) to 53 percent (16 FTEs). In most districts with administrative staff decreases, the number of students served has also decreased slightly. Decreases are due primarily to declining resources and mandated salary increases.

Positions lost include central office content specialists, school liaisons for both instructional support and compliance monitoring, and other administrative specialists. There were no cross-district patterns in the type of staff cut.

Only four districts, three in the same state, show significant increases in Chapter 1 allocations. In three of them, administrative FTEs have increased. One district that formerly supported all Title I administration with local monies has shifted .45 FTE to the Chapter 1 budget for administration. The other district has increased its total professional and clerical FTEs from 32 under Title I to 35 under Chapter 1. The third district has added one content specialist. In two of these districts, more students are served.

Parent involvement and evaluation specialists. Twelve districts had parent involvement specialists under Title I; but only seven of the 27 (including three from one state) now have either professional or paraprofessional parent involvement specialists. Usually coordinators or principals are responsible for whatever parent involvement activities the district sponsors. One small, three medium, and three large districts have specialists. In two of these districts, FTEs allocated for parent involvement decreased after Chapter 1 became law.

In districts with parent involvement specialists, FTEs for professionals range from .25 to 2, depending mostly on district size. Some districts employ paraprofessionals, usually Chapter 1 parents, ranging from 2 FTEs in a medium-size district to 70 FTEs in a large district where an aide is assigned to each Chapter 1 school.

In-house evaluation expertise is also found predominantly in large districts. Three medium-sized and seven large districts allocated some Chapter 1 funds for evaluation specialists. FTEs supported by Chapter 1 ranged from .05 to 2, depending on district size.

One mid-size district has dropped Chapter 1 funding of an evaluator since Chapter 1 and four large districts have reduced the FTEs allocated. None of the small districts now support evaluation specialists or did so under Title I.

Economy of administration by organizational type and size. Larger districts tend to employ more administrative staff, but do they serve proportionally more students and employ more instructional staff? Data were analyzed for economies of scale and differences related to type of administrative organization. Ratios of number of students served and instructional staff employed (professional and paraprofessional) per 1 FTE administrator were computed for each district to allow comparisons of time allocated for administration across districts.

Staff were counted as administrative as opposed to instructional if they described their jobs as compliance assurance or instructional support rather than classroom instruction. District budget listings of "administrative" or "instructional" were not used. Instructional support staff, for example, are often called support teachers or resource teachers, and in district budgets sometimes appear to be instructional staff. Evaluation and parent involvement specialists were not included in the ratios because these positions are strongly associated with district size.

As indicated by the data in Table 2-6, the more complex the administration, the larger the staff. Differences in ratios flatten out somewhat but show a similar pattern when averaged by size.

Table 2-6

Students Served And Instructional
Staff Employed Per 1 FTE Administrator

	Average No. of Students Served per Administrator (1 FTE)	Average No. of Instructional Staff per Administrator (1 FTE)
Type of Administration		
Part-Time Generalist N=8	1446	48
Simple Differentiated N=5	1166	24*
Complex Differentiated N=8	647	22
Size of District		
Small N=9	1194	42
Medium N=9	879	25**
Large N=7	807	21

*N=4 One district did not report staffing data.
**N=7 Two districts did not report staffing data.

Information not shown in the table describes the three districts with full-time coordinators and no other administrative staff. These districts average 559 students and 29 instructional staff per administrator. Note that in the "functionally integrated" districts, time spent on Chapter 1 administration could not be separated out. In these three districts, however,

administrative FTEs are about the same as or less than would be expected solely for Chapter 1 administration in districts of comparable enrollments and allocations.

It is important to point out that size and complexity are not the only factors determining economies of administration. One of the small "part-time generalist" districts served fewer students per administrator than most of the complex ones.

The ratios are crude measures of economy of administration; but assuming that the trends are not simply artifacts of sample size and methodology, they raise the question of why administration requires more time in larger and more complex districts. Why were no economies of scale found?

Several hypotheses emerge from comparison of the districts. However, given the small sample size and the time limitations of the AAI study, these possibilities could not be systematically explored. One possible explanation is that Chapter 1 requirements, such as comparability and school targeting, demand more time in larger districts. Many small districts have little or no responsibility in these areas. The fact that state Chapter 1 monitors spend considerably more time in large than in small districts probably reflects the disproportionate level of effort required to demonstrate compliance there.

Another possible reason is that in large districts, the tendency toward bureaucratization adds to the administrative load. For example, an apparently straightforward process, such as getting approval for the purchase of Chapter 1 material (as previously budgeted), was said to be very time-consuming by administrators in one large district.

Coordinator tenure. The district coordinators in this sample have been involved in Title I or Chapter 1 programs for an average of 9.8 years, as follows:

0-5 years	9 coordinators
6-10 years	6 coordinators
11-15 years	4 coordinators
20 years	7 coordinators.

Slightly over 60 percent of the coordinators were involved in compensatory education programs while the 1978 Title I regulations were in effect; many experienced the history that led to their development. The 20 veterans are fairly evenly spread across districts of all sizes; coordinators with fewer than five years' experience are somewhat more concentrated in the smaller districts.

Changes In Local Administrative Practices Since Title I

While various changes in administrative practices were reported by districts since the passage of Chapter 1, most are considered minor by researchers and district staff. Only a few show patterns across districts, within district size categories, or within states. Changes in staff training, managing and supervising instruction, program design, program coordination, and time and burden associated with application preparation are reported below.

The only changes cited with any frequency are related to in-service training. A number of districts report a decrease in training of instructional staff and principals concerning Chapter 1 regulations, primarily because staff tenure in the program has increased and only updates are needed. Several districts also report increased Chapter 1 staff participation in conventional instructional staff development workshops.

AAI researchers report moderate or substantial changes in managing and supervising instruction for six or seven small districts where information is available, two medium, and no large districts. Changes similar in substance to those in smaller districts were reported in larger ones, but they seem to have been considered minor because their overall impact was not as great. For example, in a small district a new Chapter 1 coordinator with a reading specialization supervises and demonstrates new approaches to reading instruction. She may be providing no more new supervision or staff development than a new reading specialist in a more complex district, but in her small district she represents a substantial reorientation of Chapter 1 administration.

Changes in program design were also noted since Chapter 1, but most either represent minor program modifications or affect only one school. For

example, in one district, where the budget increased, a reading teacher was hired -- a substantial change in a program using mainly aides. Grades served in a school changed when a principal requested the modification.

A number of coordinators say that they intend to integrate Chapter 1 and conventional instruction, using, for example, joint in-service training. Rarely, however, do Chapter 1 administrators talk of increasing "ownership" of the program by principals or of trying to engage principals in program development. AAI researchers could not document whether coordination is increasing.

The time and burden associated with application preparation was expected to decrease under Chapter 1. As indicated by the data in Table 2-7, the decrease is less than expected. Only a third of the districts report even minor decreases in application paperwork. Time spent on applications remains high, with considerably more time needed in the larger districts. Nevertheless, only a few coordinators consider applications a burden. Experience, and in some cases word processing or computerized school data, ease preparation. More important, coordinators express such attitudes as "It's just part of the job." "For money, we don't mind doing anything." A few responses are more positive. For example, one said that application preparation is a discipline that maintains "the integrity of the planning process." Another noted that it is an opportunity to involve relevant parties -- teachers, principals, and parents -- in program decision making. It is not clear whether these attitudes represent a change from opinions coordinators held under Title I.

Table 2-7

Change In Burden Associated With
Preparing District Chapter 1 Applications

Change in Burden	Number of Districts*	Number of States
Moderate or substantial decrease	4	2
Minor decrease	6	4
Increase	3	1
No change	11	5

*Data are complete for 24 of the 27 districts. Comparisons across time are not available for three districts because of staff turnover.

In summary, state and district Chapter 1 organizational structures, staffing patterns, and general operations exhibit considerable similarity, while at the same time specific practices vary across states and districts. Little change is reported. The factors associated with these patterns will be discussed in the next chapter.

CHAPTER 3

FACTORS AFFECTING STATE AND DISTRICT CHAPTER 1 ADMINISTRATIVE PRACTICES

INTRODUCTION

In a nine state subsample of the 20 states described in Chapter 2, this chapter explores the major influences on Chapter 1 administration. In the state administration of Chapter 1, we are concerned with factors affecting such matters as how states monitor districts, what technical assistance they provide, how they balance their regulatory and assistance functions, and whether they make rules. In the 27 school districts visited, we are concerned with factors affecting local Chapter 1 administration -- how districts manage and supervise their programs, who makes decisions about program design, and how staff development and training is provided. The main focus of our research in districts was state influence on district administration.

This study is interested in intergovernmental influences -- the relative importance of changes in federal law and federal direction to state administrative practices, and the relative influence of state administration on local Chapter 1 administration. Hence, the discussion focuses on the factors themselves -- e.g., federal law, state political context, locus of authority in school districts -- rather than on Chapter 1 administrative categories (e.g., monitoring, technical assistance). Their influence is also more apparent when one looks at administration as a whole rather than at its components.

The final section of the chapter explores why there has been so little change from Title I to Chapter 1 administration, except for those changes brought on by the reduced set-aside or reduced allocations.

What states and districts do in response to the federal fund allocation procedures and program design requirements is covered in Chapter 4.

STATE CHAPTER 1 ADMINISTRATION

A variety of factors influence state Chapter 1 administration, ranging from state political culture and educational climate through historical relationships between local and state education agencies to federal

influences inside and outside the Chapter 1 program. To understand more fully the range of factors shaping state administration, and especially the state/district connection, we made additional visits to nine of the 20 states and to three districts within them. This chapter includes only nine states' information, unlike Chapter 2, which reported on activities in all 20 states.

In analyzing administrative practices in the nine states, we found state Chapter 1 administrations generally clustered in two groups. One group tends to continue Title I practices in application requirements and monnitoring and rulemaking activities. Technical assistance in these states focuses on regulatory compliance, and program improvement activities continue to be minimal. These six states responded to the reduced set-aside by eliminating practices not directly tied to compliance. Rather than reducing compliance and program improvement proportionally, these state Chapter 1 administrations sought to maintain as much compliance activity as possible. Disproportionate cuts were then made in program improvement. Staff cuts were made by seniority. We decided to call these states traditional.

States in the other group, by contrast, have each taken recent steps to reduce paperwork burden and streamline monitoring. They delegate greater responsibility for maintaining compliance to the districts. These states give more technical assistance on program improvement (including the evaluation of alternative program designs). They tended to respond to the administrative budget cuts by reorganizing their Chapter 1 program administration. We decided to call these three states changing, although they are not necessarily changing as a consequence of the change in law from Title I to Chapter 1.

A word of caution about these clusters. While the nine states fall into two groups clearly distinguishable in terms of their administrative practices, states do vary somewhat within each group. Also, the clusters are not entirely mutually exclusive: rather, one group of states does more of "x" than another, which does more of "y". Moreover, the two clusters are not monoliths, nor should one generalize from them to all state Chapter 1 administrations.

Earlier studies of Chapter 1 administration also clustered states along continua and used such terminology as directive vs nondirective, assertive vs nonassertive, quality vs compliance oriented, or compliance vs

assistance oriented.* We were aware of these classifications and used "role orientation" as a sampling criterion for selecting both the 20 and the nine state sample. Once our field work was under way, however, we found that this classification did not work for our sample of state administrations. We could not clearly draw a line between directive and nondirective (or assertive and nonassertive) state administrations, and none of the states could be called "inactive" in the sense Bessey used "compliance oriented." Only one state in our nine state sample could be called "quality oriented" in that it emphasized assistance for improving the quality of program content; and even here it was more a matter of state intentions, seldom borne out by districts' reports. Hence, we developed our own clustering of states on the basis of our data. A description of the two clusters follow.

Traditional Chapter 1 Administration

Six of the nine states can be characterized as traditional. Their activities, although somewhat reduced with budget cutbacks, remain predominantly compliance oriented. Four have not altered their focus since Title I, while two others initially reduced but then quickly returned to a

*In one eight-state study, "directive" Chapter 1 administrations were those with "a number of state policies and practices designed to direct districts to approach Title I in a particular manner and with particular thrusts" (Goettel et al., 1977, p. 35). Similarly, in telephone interviews to state coordinators the year after Chapter 1 passed, "assertive" states were those where the SEA provides leadership, sets standards, plays a key role as interpreter and enforcer of federal statutes. In "non-assertive" states, the district takes the lead and sets its own standards while the SEA is a persuader, not an enforcer (Lorber, 1985, p. 1). "Quality oriented" states in Bessey's study of all state Chapter 1 administrations were "active" state administrations. They did not rely on U.S. Department of Education (ED) models, took on extra activities to ensure program quality, but were also active monitors of compliance. They did not do compliance activities for compliance's sake, but also for quality (Bessey et al., 1982, p. xix). In that study, "compliance oriented" states were generally inactive throughout all areas of their state responsibilities, liked the idea of having ED develop models for different administration activities, and tended to favor less personalized methods of service delivery (Bessey et al., 1982, p. xix). "Compliance oriented" states, as defined by Lorber (1985, p. 1), were not "inactive" states, but rather those where state administrators put most emphasis on securing district compliance with all statutory and regulatory requirements. The state Chapter 1 office may also provide assistance on improving program content, but this was a secondary concern.

strong compliance orientation. All expressed a desire to maintain Title I requirements or rely on the specificity of Title I to prevent audit exceptions. All issue written guidance to districts to help ensure compliance.

In the traditional states, compliance monitoring was reduced, but not so as to put more resources into technical assistance for program improvement. In fact, most traditional states now offer less technical assistance; and districts within these states indicate significantly less assistance than even the state reports suggest. While ten districts in five states noted that the state Chapter 1 program provides assistance informally during monitoring and over the phone, the amount of assistance is modest at most and focuses on rule clarification. No districts reported any sustained contact with the state Chapter 1 program for technical assistance, even in the one state that claims to offer workshops tailored for individual districts. Only three districts in two states indicated any state attention to curriculum or program quality improvement. Few district administrators could remember receiving any advice on program development or instructional strategies from the state Chapter 1 program.

In addition, traditional states have not reduced the paperwork burden for themselves or their districts. Five of the six states continue the same application cycle as under Title I; one went from a three-year to a one year cycle. Four states require an annual application; only two follow the permitted three-year cycle. Program application requirements have changed only slightly. Assurances were added, but not substituted for data or narrative in most cases, although less detail was required for parent involvement.

We do not imply that traditional states cling to established procedures unthinkingly, nor that they are not changing. They do consider how to improve administration and do make adjustments in their practices; but in the main they follow the patterns established under Title I.

Changing Chapter 1 Administration

Over the past five years or so, the three changing states have substantially modified either the intent of their Chapter 1 efforts or their daily operations. These states do not resemble each other so much as they

differ markedly from traditional administrations. Each state is described separately.

In one state, Chapter 1 is part of a set of consolidated supplemental services. The state preceded the federal government in reducing paperwork by adopting a consolidated application for its major supplemental programs, including Chapter 1. It also relieved the SEA of reviewing school-level plans for program quality efforts, shifting that responsibility to consortia of local educators from other districts. The state now provides technical assistance only on the legal details of the grant application and evaluation use for program design, although it recently also released information on effective compensatory education programs. Shortly after the new chief state school officer took office a few years ago, compliance monitoring for all categorical programs was consolidated into one unit. Compliance reviews once every three years were to cover all programs and to focus solely on the legal requirements and regulations. School districts were to do self-evaluations before the state compliance reviews. Staff, including Chapter 1 personnel, were reassigned to match the SEA's functional organization. The state legislature and the chief state school officer have been the key factors in changing the organization of Chapter 1 responsibilities in the SEA.

In a second changing state, state agency officials organizationally situated above the Chapter 1 program interpreted the new law to permit virtually complete decentralization of the program. As a consequence, the application was reduced from 36 to three pages, conferences between district and state Chapter 1 officials were eliminated, the state Chapter 1 program provided no clarification or informal rules about the new Chapter 1 provisions, and monitoring decreased by half. Greater control of the program was given to school districts, though not as the result of local pressures. Three years later, in 1984, this course was altered somewhat after federal monitors criticized the state's monitoring, massive underspending was reported by the big city newspapers, and the lack of written guidelines resulted in inconsistent messages to school districts. Since 1984, the state Chapter 1 program has issued technical assistance memoranda that offer guidance on compliance matters. Some compliance monitoring issues remain unresolved, and some requirements might revert to their Title I form.

The third changing state appears to be changing more in intention than in operation. New staff and a new director are both firmly committed to program improvement. They refer to program quality in guidelines and program applications, and have sought to shift monitoring and technical assistance to emphasize program quality. SEA Chapter 1 staff reported that Chapter 1 "allowed time for a new kind of contact with our districts" and that "we shifted from being regulators to being problem solvers." The state, however, is a very poor one; the limited resources of the SEA, coupled with a cadre of well qualified school district staff, prevent the state Chapter 1 program from taking a more active leadership role. Unlike the other two changing states that have transferred more authority to school districts in the past five years, this state appears to have a more firmly established tradition of local autonomy, and no state Chapter 1 policies are established without district support. Of all the states in the study, it is the most difficult to classify, since the state commitment to program improvement has not yet had much impact on school districts.

We call these states changing, but this does not mean that all change is for the good. It is not yet clear what effects some of these changes will have. Nor have all three states changed their administrative practices in response to the Chapter 1 law; the state that consolidated programs did so before Chapter 1 went into effect.

Similarities Between Traditional and Changing Chapter 1 Administration

The range of difference in administrative practices between traditional and changing state Chapter 1 programs is relatively limited for several reasons. Across all states, the premise of Title I/Chapter 1 -- to provide supplemental services to low achieving students in poor schools -- is widely accepted within SEAs. Only one state initially sought to use Chapter 1 more as a block grant than as categorical aid. In the past two years, however, its administration has become increasingly more compliance oriented, at the urging of federal monitors.

In addition, all states recognize and accept their primary responsibility -- to ensure the legal operation of federal programs. Other studies document how headline audits and increased federal emphasis on regulation under Title I resulted in close compliance with federal regulations

(Kirst and Jung, 1980). It also resulted, with some marginal variation, in similar state roles in management and implementation (Goettel et al, 1977; McDonnell and McLaughlin, 1982; SRI International, 1979). States vary in their emphasis on monitoring, technical assistance, application approval, and so forth, but the functions themselves are quite similar. We also found across all states that much Chapter 1 administration relies on standard operating procedures that evolved over the past twenty years.

Much administrative practice also hinges on the working relationships individual state Chapter 1 staff have negotiated with school districts. Over time, state staff have come to identify with the districts they work with and tend to refer to them as "my" districts. This attitude is an outgrowth of federal categorical initiatives, where federal, state, and local program staff see themselves as part of a vertical network, committed to particular federal policy goals (Derthick, 1970; McLaughlin, 1982). These well-developed relationships preclude much change, and the compromise and negotiation that typify intergovernmental relations between the state and its school districts sets limits on the range of diversity.

Factors Affecting Traditional and Changing States -- An Overview

The traditional state Chapter 1 programs retain their Title I compliance focus primarily because certain factors within the program foster continuity, while external factors do not force or encourage change. As discussed later in the chapter, program administrations are greatly influenced by their long-term directors who strongly believe in the Title I objectives. They also, for the most part, identify with the national network of Chapter 1 directors. Half the directors are wary of federal intentions under the Reagan Administration or have experienced difficult audit exceptions. Chapter 1 staff are also long-term veterans who concentrate on compliance monitoring. Finally, the isolation of the program within the state agency often reinforces stability and precludes much involvement with state initiatives.

In the changing state Chapter 1 programs, on the other hand, administrative practices are more strongly influenced from outside the program itself, by events, trends and priorities in the state agency and the culture and educational climate of the state. AAI researchers found Chapter 1

directors in these states to be less influential than those in traditional states, in part because they are relative newcomers.

In the following discussion of specific factors affecting state administration, we employ the clustering of state program administrations when it is important to distinguish among states. Where there are no differences in practice, we treat both groups together.

State and State Education Agency Influences

The state Chapter 1 program is embedded in the state education agency and is therefore influenced by the agency's orientation and philosophy. The state agency in turn is influenced by the larger state context, the strength of the state government generally, the importance of education as an issue, and the role of the SEA in state education policy. As previous studies have shown, these are extremely powerful influences that limit options open to Chapter 1 administrations (McDonnell and McLaughlin, 1982). Particular state influences on state Chapter 1 administration are described below.

In traditional states, fiscal conservatism and the desire to avoid audit exceptions enhance the compliance orientation of the SEA Chapter 1 program, as does the absence of state leadership in school and program improvement that might involve Chapter 1. By stressing its compliance mission, the Chapter 1 program can operate relatively independently within the SEA. This is not to say that the state plays no role in the program design of traditional Chapter 1 programs; but it does not influence administrative activities, such as monitoring or application review. The state's interest in areas such as early childhood education may lead the Chapter 1 program to adopt a similar focus, or a new state minimum competency testing program may result in a new Chapter 1 initiative in high schools to increase the number of students passing the test. AAI researchers encountered both these examples, but in neither case did the changes influence administrative practices.

Among the changing states, on the other hand, state initiatives strongly influence Chapter 1 administrative activities. One state's strong commitment to coordination transformed the Chapter 1 program. State consolidation of supplemental programs into a single application, with coordinated compliance monitoring, substantially changed its Chapter 1

program. In another state, the upper-level SEA decision to treat Chapter 1 as a nonregulated block grant greatly reduced state activity for the first three years of the Chapter 1 program. The intention in the third changing state to improve program quality also affects the Chapter 1 program. Because state intentions are recent, it is not yet clear how strong this influence will be.

In all three changing states, the Chapter 1 program is identified more as a state program than as a quasi-independent federal initiative, and the state Chapter 1 director is seen primarily as a state agency employee, not as a member of the Chapter 1 directors' network. State and state agency initiatives do treat the Chapter 1 program not as an independent program within the SEA, but as one that can be modified to fit state purposes.

State Chapter 1 Program Influences

Because traditional state Chapter 1 programs are likely to be more autonomous than changing ones, internal influences -- e.g., tenure, philosophy, and background of the director and staff -- are more dominant than in changing states in determining the framework and overall direction of state administrative practices.

In the traditional states, one of the most powerful influences on administration is the program director, whose tenure, professional orientation, and philosophy substantially shape program activities. Nearly all state directors in the traditional states first identify with the national Chapter 1 network of state directors and only secondarily as employees of their SEAs. The directors manage the Chapter 1 programs as federal initiatives housed in state offices rather than as state programs, and the programs are treated accordingly within the SEA. They seldom participate in discussions of new state initiatives. This isolation helps to preserve the categorical nature of the program. Identification with the Chapter 1 network, through participation in its national meetings and information exchange, also reinforces the traditional program. The national network has sought to keep Chapter 1 as much like Title I as possible, so as to remain a cohesive political force to counter federal efforts to reduce the Chapter 1 budget. The network of directors also voted to retain the Title I Evaluation Reporting System (TIERS) so that national information on program effects could be used in Congressional hearings.

In most traditional state Chapter 1 programs, the directors see their role as solely or primarily compliance monitoring. They gave various reasons for that focus. Some noted that compliance was the main (or only) orientation of the state agency. One said that earlier program improvement efforts had been rebuffed by school districts and had been dropped. Many stated that they and their staff have little expertise in program improvement. Also buttressing their compliance orientation is the apparent wish of school districts for compliance guidance from the SEA. In four of the six traditional states, Chapter 1 directors and staff repeatedly mentioned district requests for such guidance as a justification for rulemaking and monitoring activities.

Directors in these states strongly believe in the intents and approaches of Title I. They do not encourage a state Chapter 1 role in fostering change in district programs. Even among state staff with program improvement expertise, any technical assistance in that area is considered an additional responsibility, an add-on to regular staff assignments, to be pursued only as time permits. With the reduction in administration budget from 1.5 to 1 percent of the state appropriation, "slack time" for program improvement has vanished.

In five of the six traditional states, Chapter 1 offices have either few or no staff versed in program improvement. Chapter 1 program staff may have backgrounds in substantive specialties, such as reading, but have rarely used this expertise to help teachers improve instruction. Furthermore, because school district personnel, especially those in the largest districts, know their students' needs and are often better qualified in the content areas than the state staff, the latter believe it would be inappropriate for them to recommend local program design changes. SEA Chapter 1 staff thus focus almost entirely on compliance issues and never, or virtually never, initiate new program ideas. At best, they facilitate the exchange of ideas among "their" districts.

In five of the six traditional states, the long-term tenure of the state Chapter 1 director and professional staff is seen as a major factor

contributing to the stability of Chapter 1 within the SEA.* The average tenure of these directors is 8.2 years. Over time, the directors have matched the functions and responsibilities of the Chapter 1 program to the overall philosophy and structure of the state education agency. For both directors and staff, their position in the Chapter 1 office is often the last stop in a long career of professional advancement in the state.

In half (three) of the traditional states, the Chapter 1 program relies on the Title I regulations, mainly because the directors are wary of federal motives under the new law. Behind their mistrust lies either a history of multi-million-dollar audit exceptions (that were unresolved or had taken years to resolve), or the state agency's fear of incurring audit exceptions regardless of audit history. Two of these states initially reduced compliance monitoring somewhat. One resumed its compliance focus after about six months, while the other increased compliance activities (and use of the Title I regulations) when the federal office released its Nonregulatory Guidance and the SEA could obtain no federal clarification of the meaning of changes.

Influences generated within the state Chapter 1 program are less powerful in the changing states than in the traditional states in part because the programs are less isolated within the state agency. In addition, the state Chapter 1 directors in changing states seem to identify more with the SEA and have more job mobility than their counterparts in traditional states; all three are new to their positions since Chapter 1 passed, and have an average tenure of two years as directors.

School District Influences

The strength of the local control tradition greatly affects Chapter 1 administrative practices, just as it affects the general approach the SEA takes with school districts. The relationship between the state and school districts limits the strength of SEA intervention (McDonnell and McLaughlin, 1982). Other important school district influences are district size,

*The sixth state, with a new director, maintains a Title I compliance focus mostly through fear of audit exceptions and wariness of Reagan Administration motives.

compliance history, tenure of the Chapter 1 director, and whether the district solicits assistance.

The established relationship of school districts with the SEA restricts Chapter 1 administrative activities. For example, in eight of the nine states, formal technical assistance for program improvement is limited in part by local autonomy in curricular issues. In these states, school districts have historically had primary responsibility for curricular design. For the state Chapter 1 program to provide technical assistance on program quality would require the SEA to intrude into what both districts and the state consider local responsibilities. The only state with less local autonomy is the changing state with consolidated supplemental programs. The consolidation decisions and subsequent merging of Chapter 1 with state compensatory and school improvement initiatives were little influenced by districts, although the reduced administrative burden now has considerable local support.

In all but one state, states confine their involvement in local programs to issues of compliance. All states accept the responsibility of running legal programs, and all report that, with rare exceptions, district coordinators are committed to operating legal programs as well. But traditional and changing states differ in how much regulatory specificity they report districts want and in what they anticipate districts would do in the absence of such specificity.

Four of the six traditional states reported that their districts prefer detailed interpretations of Chapter 1 regulations and are most comfortable when they know what the federal government expects as interpreted by the SEA. Districts tend to rely on the state Chapter 1 program for information on federal regulations that (according to some state staff) make it easier for them to maintain stable Title I programs. The changing states did not report that their districts want greater specificity, although several districts in the state that provided no policy guidance at all have requested some clarification.

In the absence of specificity (coupled with reduced compliance monitoring), the traditional states reported anxiety that major audit exceptions might occur, although they also reported that current audit exceptions are minor and are usually due to ignorance of complex rules or to

carelessness. This concern helps sustain the strong compliance focus of state administrative activities.

The changing states, on the other hand, reported that their districts would continue to comply with the law, though they might disagree with some aspects of it, in exchange for federal funds. These states were not concerned that major audit exceptions would occur, and have in fact turned over to districts a greater responsibility in compliance monitoring.

District/state relations also affect the way in which regulatory specificity is conveyed from traditional state Chapter 1 offices to school districts. The state Chapter 1 office must enforce through persuasion, negotiation, and friendly relations, not by edicts. Public conflicts between the state and district Chapter 1 programs are to be avoided. Three of the six traditional states are especially cautious in their relations with districts. In one state, the state Chapter 1 director actively discourages his staff from responding to local requests for program advice or assistance, because his former supervisor rebuked him in writing for criticizing a district's curricular materials. In another state, Chapter 1 staff spoke of working hard to develop and maintain amicable relations with districts, partly to prevent district staff from taking disputes to the state agency's associate superintendent. The fear of making mistakes was reported to be so strong among Chapter 1 staff that they were reluctant to write formal letters to districts for compliance violations. "We simply operate on the basis of informing the district in person," and on subsequent visits, asking whether the problem has been corrected. "And this can go on for several years." This traditional state has few written policies to guide state Chapter 1 staff decision making, with the result that there is considerable variation in acceptable local practices. Flexibility in negotiating with districts to find a point of agreement without conflict is key in this state's administration of Chapter 1.

How much attention the state Chapter 1 office gives to compliance monitoring in districts also depends on district size, compliance history, newness of the Chapter 1 director (and sometimes a new superintendent), and whether the district solicits assistance. The largest districts are visited more often and for longer than smaller districts, so the SEA has more presence in larger district offices (but not in individual schools). Districts with a

long history of clear, well-managed programs may be monitored more cursorily than districts that have had compliance problems. Districts with new directors may be visited out of the formal sequence to provide compliance assistance, and states often either link new directors with veterans or provide additional workshop training for new directors. Last, state Chapter 1 offices try to be very responsive to district questions about regulatory matters.

Federal Influences

The reduced set-aside, the initial ambiguity in the law and lack of guidance from the Education Department, the continuing audit function, and federal initiatives in program improvement all influence state Chapter 1 administration.

The set-aside. The single most important change for state administration of Chapter 1 was the reduction in the administrative budget from 1.5 to 1 percent of the total state allocation. Maintaining staff was the main concern of all Chapter 1 directors. Immediate staff reductions were made by seven of the nine states; the one "floor" state maintained its $225,000 allocation, and one other state had a sufficiently large carryover to spread staff cuts over several years.*

Traditional and changing Chapter 1 administrations responded differently to reductions in the set-aside. Staff cuts in the traditional states were made mostly by seniority within the SEA, while changing states were more apt to use the set-aside reduction to revamp administrative activities.

In the traditional states, parent involvement and evaluation specialist positions were reduced or eliminated, with the staff in these positions usually taking on general monitoring functions. The compliance orientation of the traditional states appears to have greatly influenced how

*All state Chapter 1 programs have a minimum administrative budget of $225,000 even if 1 percent of the state allocation is less than this amount. The $225,000 is called the "floor" amount, and a state with this budget a "floor" state. There was no reduction in the floor amount from Title I to Chapter 1.

reductions were made. Compliance activities were sheltered and program improvement activities were reduced, eliminated, or not initiated.

In two traditional states, the reduction in set-aside was particularly troublesome. In one state where some Chapter 1 staff and an upper-level SEA official were committed to program improvement, the decision to maintain all staff while cutting staff training and dissemination activity is now seen as a crippling mistake, since it precluded their involvement in later state initiatives in curriculum improvement. The second traditional state is experiencing staff burnout because the increased load makes the annual compliance monitoring of Chapter 1 districts very difficult.

In two of the three changing states the reduced set-aside was used more as a stimulus for redesign. Staff positions were eliminated when administrative activities were reorganized. The consolidating state, for example, dropped the review of local school improvement plans and thus the corresponding positions. Although its administrative budget was only 15 percent less than under Title I, the deregulating state reduced its Chapter 1 monitoring staff by half, following an upper-level SEA view that Chapter 1 called for less state intrusion and less compliance monitoring. The third changing state has a "floor" budget and will begin cutting staff only this year when inflation will have eroded its buying power.

In neither traditional nor changing states did Chapter 1 offices deal with the reduced budget by transferring Chapter 1 functions to other SEA offices, except for the costs of auditors. In some cases school districts picked up the costs of auditors; in others, financial support for auditors in the state office was reduced or eliminated.

The effects of the reduced set-aside are exacerbated by two other fiscal factors: inflation and shifts in state allocations due to the 1980 census. These factors affected traditional and changing states equally. Inflation cut into the buying power of all states, so that even the "floor" state faces a reduction in its professional staff this year. In no state was there a sufficient increase in the total allocation to off set the one-third cut in administrative budget.

Dramatic shifts in state allocations were seen in two states, one traditional and one changing. In the traditional state, funds were markedly

reduced due to population shifts. Half the professional staff (and all four instructional specialists) were transferred out of the program, leaving no expertise in technical assistance in program quality and less on-site monitoring time. In the deregulating changing state, a marked increase in state allocation resulting from the 1980 Census coincided with the state decision to reduce its role. Having cut back its monitoring, the state did not discover significant local underspending until metropolitan newspapers made it public.

Chapter 1 law and regulation. The content of the Chapter 1 law and associated regulations as well as the process of Chapter 1 rulemaking influenced state administrative practices. Although word quickly spread in 1981 and early 1982 that both Technical Amendments and Nonregulatory Guidance would be forthcoming, all states had to deal with the ambiguity in the new law. The traditional Chapter 1 administrations responded with state guidance following Title I regulations, while the changing Chapter 1 state administrations did not.

Initially, the lack of specificity in Chapter 1 law coupled with the lack of guidance from the federal Chapter 1 office resulted in a continued strong compliance focus in four of the six traditional states, which issued informal recommendations or rules mirroring Title I regulations. The other two traditional states briefly reduced compliance monitoring when Chapter 1 first passed, in keeping with the intent to reduce administrative burden. But monitoring was quickly resumed, complete with detailed documentation, when it became clear that federal auditing and monitoring seemed to require sizeable paper trails.

Unlike the traditional states, the changing states did not increase rulemaking in response to ambiguity in Chapter 1 legislation. Each state Chapter 1 administration reacted differently. In the changing state that had already consolidated Chapter 1 with other supplemental programs, the absence of specificity was of little consequence; it simply allowed the state to continue what it had started. The state that most strongly embraced the Chapter 1 intention of reducing paperwork and federal and state involvement simply transferred responsibility for interpretation to school districts. This became problematic when the Nonregulatory Guidance, the Technical Amendments to Chapter 1, and reinstated federal monitoring signaled a need for

a stronger state role in policy interpretation. In the third changing Chapter 1 administration, the SEA Chapter 1 program needed federal backup to maintain its position vis-a-vis largely autonomous school districts and, later, to give its emerging program improvement efforts some clout. It was therefore frustrated by the lack of federal guidance.

Audits. The lingering effects of early federal audits of Title I are not to be underestimated. Most state directors remember the headline audits of the late 1960s and early 1970s that uncovered gross misspending of federal funds. Traditional states expressed fear that major audit exceptions would recur in the absence of strong state compliance monitoring, while changing states were more apt to argue that exceptions would not recur since districts had learned the allowable boundaries of federal spending. With some differences between the traditional and the changing states, the possibility of federal audits keeps all states sensitive to the need for documentation.

Current state auditing of federal programs reflects unambiguous federal influence on state behavior. In all but one changing state, auditing practices changed only because of changes required by OMB Circular A 102-P (and again with the yet to be implemented Single Audit Act). The speed with which changes were made depended upon state factors, including state auditing capabilities, but the stimulus for change was solely of federal origin.

Federal Chapter 1 office. In 1981, as the federal administration sought to consolidate and simplify federal law, it was also attempting to dismantle the U.S. Department of Education, and convert it into a smaller research and data collection agency with some technical assistance programs. Once the ECIA passed, major reductions in force were instituted within ED, reducing the Chapter 1 staff and those of other program areas. Between 1981 and 1984, two such RIFs went into effect, and current ED staffing is 25 percent below the 1981 level. In addition, staff were reassigned and ED was reluctant to provide interpretations of the newly passed Chapter 1.

All states saw changes in interactions with the federal Chapter 1 office, but varied in their responses to how the changes influenced their own Chapter 1 operations. All states reported that communications were few and not timely, with federal officials reported to be reticent and unwilling to respond to state questions. Substantive assistance was poor or nonexistent, and some states no longer initiate any communication with Washington. In

general, traditional states dealt with the lack of federal guidance as they had with ambiguity in the law, by relying on Title I regulations, while the changing states for the most part were either unaffected or welcomed the greater flexibility.

Four traditional state Chapter 1 administrative met the changes in the federal office with some frustration and irritation; but there was little floundering within the Chapter 1 program itself. State directors said they relied on the known legality of Title I regulations. For the two remaining traditional states, changes in the federal office had serious consequences. These states had a history of audit exceptions; they were wary of federal intent and concerned that the federal government would later step in to judge them by standards that had not yet been made explicit. One director said that the federal government was trying to "trick" the state into noncompliance. Both states thus took a conservative stance on Chapter 1. They increased their rulemaking, maintained a heavy compliance focus, and kept Title I guidelines virtually intact. One moved from a three year to a one year application from districts, thereby increasing paper compliance activities.

Among the three changing states, two reported that they were either unaffected or welcomed the reduced federal role, while the third would have preferred more specific guidance. Federal monitoring, at least in one state, appears to set limits on how deregulating the state Chapter 1 administration can become.

The changing state with consolidated programs already had a history of independence from Washington and reported that it continued its own initiatives, unaffected by the lack of federal guidance. The changing state that greatly reduced its role in Chapter 1 administration welcomed the lack of federal guidance. But tensions have surfaced between state administrators and federal monitors as recent federal monitoring visits have instructed the state to increase compliance monitoring and visits to districts. The federal office is also becoming more prescriptive about requiring districts to test for comparability (see Chapter 4 for details). The changing state seeking to increase its program improvement emphasis saw the law as supporting a less regulatory role for the state but would have preferred more federal guidance. It had relied on the specificity of Title I to strengthen its

influence vis-a-vis school districts and now found its position somewhat undermined.

The Secretary's Initiatives for Program Improvement. The Secretary's Initiatives were of two types: a grants program to SEAs and a recognition program to school districts for exemplary Chapter 1 projects. The state Chapter 1 administration most enthusiastic about the Initiatives was the changing state strongly committed to pursuing program quality. In this rural state, SEA and district personnel spoke with pride of the disproportionately high number of districts commended as outstanding. The SEA Chapter 1 program also worked with its Technical Assistance Center and two other rural states in preparing a tri-state booklet on exemplary practices and programs that the SEA is now strongly encouraging districts to use. The state Chapter 1 director in one of the traditional states was also very enthusiastic about the Secretary's Initiatives, wanted more improvement grants for SEAs, and urged that Chapter 1 require states to pursue program improvement. This state had funded a large project on the characteristics of effective classrooms, and the report was being printed at the time of our last visit. It is uncertain whether the findings will strongly affect SEA practices, given the history of previous activities focusing on compliance. Three other states -- two traditional and one changing -- appeared to find the recognition program significant, either for identifying districts to give workshops at summer conferences or as good public relations to keep the Chapter 1 program intact. The remaining four states -- three traditional and one changing -- did not mention the Secretary's Initiative, did not submit districts for recognition awards, or thought the efforts "political" and not a good program improvement tool.

LOCAL CHAPTER 1 ADMINISTRATION

This section examines what influences local Chapter 1 program organization and management, who decides what staff training is provided and on what topics, and, to a lesser extent, how instructional design decisions are made.

Local Chapter 1 administrative practices are most strongly influenced by factors within the district. The size of the district, the balance of central office versus school-based authority, and the district's

priorities play central roles, as do the characteristics and tenure of the Chapter 1 coordinator and staff.

AAI researchers focused on the relative influence of state administration on district administration, especially on whether differences exist among districts with traditional and changing state Chapter 1 administrations. The discussion of district and federal factors influencing administration should therefore be seen as exploratory -- the more so as respondents had difficulty with questions about why Chapter 1 is organized and managed as it is and who makes decisions. Much of current Chapter 1 operation is "business as usual," and has been remarkably stable over the last five years in spite of staff reductions. As a consequence, respondents were often hard pressed to explain the origins of or rationales behind given administrative practices.*

District Influences

District size, the balance of central office versus school based authority, and the district's priorities all influences Chapter 1 administration, as do the characteristics and tenure of the Chapter 1 coordinator and staff.

District size. Among the most important influences is district size (and the size of the Chapter 1 allocation), since it affects the differentiation of functions. Chapter 1 tends to be administered by part-time generalists in small districts, specialists being added as size increases. That structure influences administrative practices in the smaller districts, just as complexity and specialization affect those in the large district.

District size has other effects as well. Bureaucratization of operating procedures and formalization of relationships tend to increase with size. Bureaucratization was suggested in Chapter 2 as one reason why Chapter 1 administration appears to take more time in the larger districts. Two of the smallest districts noted that the management assets of being small include

---

*This is not unusual. The more common pattern is to ask about the importance of various influences only when program design or activities have changed. The most recent study of district Chapter 1 practices followed this approach (see AdTech, 1983, Chapter 8).

good working relations and easy communication among all district personnel. In two large districts, union contracts were said to be important factors constraining the scheduling and thus the availability of staff training activities.

District size and the Chapter 1 coordinator. District size also affects the role of the Chapter 1 coordinator. In smaller districts, the coordinator is the entire Chapter 1 administration and therefore may have a greater impact on the program than coordinators in larger districts. Changes in personnel may also be more strongly felt since someone new with different priorities and expertise can transform the program. In one small district, for example, the district's highly regarded reading diagnostician became the Chapter 1 coordinator five years ago. In that time, she has implemented a districtwide reading curriculum for Chapter 1 in the primary grades, even though the district has no centralized curriculum. Before her tenure, the Chapter 1 program varied from school to school, and some teachers had voiced concern about student learning since a high proportion of students transfer among schools each year.

In smaller districts, the orientation and duties of the Chapter 1 coordinator are pivotal in Chapter 1 administration. Where part-time coordinators are instruction oriented and also serve as assistant superintendents for instruction, special education directors, reading/language arts coordinators, or school principals, they can exert great influence over Chapter 1 program design. That influence is most strongly felt in districts where program design decisions reside in the central office rather than in the schools.

Coordinators in small districts with a commitment to program quality have ensured that there is substantial emphasis on Chapter 1 staff development, even in the absence of a similar districtwide effort. Of two coordinators with a strong belief in program coordination, one has reshaped her Chapter 1 program to an in-class model, implemented via teams of regular and Chapter 1 teachers; and the other has forged strong, supportive relationships with district principals.

In small districts, if the additional duties of the part-time Chapter 1 coordinator are not instruction related, but are focused on administrative coordination with other federal or special programs, Chapter 1

staff may receive only such instructional support as can be contributed by the locally funded administrators.

In large district Chapter 1 programs, the increased specialization may spawn curriculum and evaluation specialists and a cadre of instructional supervisors. Other resources such as computerized data bases are also available. As the size and number of schools increase and make school oversight more difficult, large districts may also hire specialists to monitor school program implementation. The central office administration mirrors this specialization, reinforcing its effect. In a number of the large cities we visited, the Chapter 1 coordinator supervised a larger and more specialized staff (especially in evaluation) than the state Chapter 1 director. One consequence of increased specialization is that Chapter 1 coordinators in large cities make few visits to Chapter 1 schools.

Chapter 1 staff. The experience and length of tenure of Chapter 1 staff also influence district Chapter 1 administration. Long-tenured teaching staff generally require less management and supervision, particularly in small districts. They understand requirements, and in two large districts were credited with helping to maintain a compliant, Title I-like program. The general influence of long-term teachers on staff training is to decrease the need for special Chapter 1 training, particularly in compliance procedures. In addition, their experience contributes to program effectiveness. In most districts where this factor is influential, Chapter 1 teachers participate fully in district in-service programs, but not in additional targeted or program-specific staff development activities.

A few districts involve Chapter 1 teaching staff directly in administrative decisions about program management and especially staff training. While the reasons for this practice vary, the high status and professional respect accorded to Chapter 1 teachers is common to these districts. These districts were more often found in the changing than in the traditional states, but there is no evidence that this practice stems from state Chapter 1 administration influence.

Embedded procedures and program. Chapter 1 administrative practices and the instructional program design in most districts have been in place for a long time. Decisions once made and implemented for some time -- in the case of Chapter 1, sometimes dating back twenty years -- are difficult to undo.

Several districts noted that they would have had difficulty changing to a program design that relied on more professional as opposed to paraprofessional instructional staff, in spite of administrators' belief that such a shift would improve student achievement. When Title I began, the districts had committed most of their allocation to aides, employing several hundred in one district. Although some professionals are gradually being incorporated, it would be politically infeasible to fire all aides and replace them with teachers. Other districts reported that it is difficult to drop a Chapter 1 school from the program as long as it is eligible, even when funds decrease. It is easier to cut back the number of grades served across all schools.

In two large districts, institutionalized procedures support a continuing orientation toward assuring compliance in accordance with the Title I framework. In several smaller districts, institutionalization was also said to contribute to the maintenance of a Title I-like program, but in addition to represent smooth, well-oiled procedures that do not hinder and in some cases even facilitate program innovation and improvement.

Central office vs. school based authority. Where decision making authority is located in school districts -- within the central office, within schools, or in some collaborative arrangement -- greatly influences how roles and responsibilities are allocated for Chapter 1 program management and supervision. (For a fuller explanation, see Chapter 2.)

In districts with a strong tradition of local autonomy, the responsibility for program design decisions (e.g., pullout vs in-class vs replacement models; use of professionals vs paraprofessionals) and for supervision and evaluation of Chapter 1 staff is allocated to the schools, primarily to the principals. Diversity in program offerings within these districts is common. Responsibilities of the Chapter 1 coordinator then focus on compliance, and generally on school targeting and student selection within eligible schools.

Where the balance of authority rests with the central office, program design decisions are more likely made there. The Chapter 1 coordinator may not have the initiating role; the decisions may come from superintendents, associate superintendents or others in curriculum and instruction.

Several districts, of varying size and in both traditional and changing states, had a more collaborative approach to management. In these districts, both central office and school based staff maintain a strong voice in program decisions, have some responsibility for both compliance and quality, and appear to work in collaboration toward common goals. The importance of principals as instructional leaders is a theme common to these districts.

In all districts, the Chapter 1 coordinator has an influence on district Chapter 1 administration and program design. The negotiating and mediating role of coordinators allows considerable scope for informal influence in spite of factors that may limit their formal authority. In districts with strong school autonomy, the Chapter 1 coordinator approves program design. In districts with strongly centralized power, the coordinator (with support from Chapter 1 regulations and sometimes SEA Chapter 1 staff) can disapprove a program design initiated by a superintendent or other senior official.

District priorities. Finally, local Chapter 1 administration is influenced by overall district philosophy and by specific district initiatives. This was true in nearly all districts, with influences on both program management and supervision and on staff training. Especially important are the district's attitudes to compensatory education, its emphasis on instruction and program quality, and its concern with curricular and program coordination.

For example, a strong commitment to compensatory education is frequently linked with local contributions to or in-kind support of Chapter 1 administration. The one (high SES, high achieving) district evidencing little commitment to compensatory education allocates little administrative time to program oversight. Districts concerned with educational quality tend to emphasize instructional matters in Chapter 1 program management and staff development as both a district and program priority. In many of these districts, Chapter 1 teachers participate fully in all local in-service programs. Similarly, a lack of local instructional leadership is linked to a heavily compliance focused program management and to few district or program staff training opportunities. Finally, curricular coordination heads a number of district educational agendas, either as a general priority or as a program

initiative. In concert with this orientation, Chapter 1 in these districts tends to be administered jointly with the regular program.

State and SEA Influences (Including the State Chapter 1 Program)

The organization and management of district Chapter 1 programs, staff development efforts, and program design decisions are subject to a number of state influences: state political culture and educational policy, traditional working relationships between the state and its school districts, and features of the state Chapter 1 program. Districts in states with traditional Chapter 1 administrations were more likely to continue detailed program applications, have extensive documentation on file, and have the state Chapter 1 administration involved with program design changes than were districts in changing states.

State political culture affects Chapter 1 in intangible but pervasive ways through the level of public commitment and funding for education in general, compensatory education, or special programs for target populations. State educational policy may more directly affect Chapter 1 program design decisions. Where state legislatures have instituted minimum compentency tests for high school graduation, for example, some district Chapter 1 programs have extended services to high schools to help students pass them. In a state with a strong state focus on early childhood education, the three districts visited all had only elementary grade programs.

The historical working relationships between school districts and their state department also affect district activities. With eight of the nine states traditionally having little voice in curriculum matters, Chapter 1 coordinators can seldom look to the state department for technical assistance on program quality assistance, and some districts expressed frustration at the lack of expertise in curricular initiatives. Where such expertise is available, districts have called upon state agency personnel to help with local staff development.

Established working relationships also affect how districts interact with the state on compliance issues. Many state and district Chapter 1 staff see themselves as part of the same network, especially if Chapter 1 programs are not coordinated with other programs, and seek to resolve any disagreements

out of the public eye. Neither side wishes to create major disturbances in existing relationships.

For districts, this includes not bypassing the state to go to Washington. Relations became strained between a Chapter 1 coordinator in a large district and the state Chapter 1 program when the coordinator called the federal office for information about states' options for distributing funds within the state. The call was innocently made, but when federal officials called the state Chapter 1 program, the director got angry with the coordinator for "going outside channels to report him." Continued pressure to allow alternative funding options has further strained relations between the district and the state. The district coordinator believes that the state is now taking a very careful approach in all dealings with the district program. Procedures have become more formal and any information requests from the district must now be in writing.

The relationship between Chapter 1 programs and other district programs often mirrors the relationship of the SEA Chapter 1 program with others in the state department. In the three states -- one traditional and two changing -- where Chapter 1 is coordinated with other state efforts, the same structure was observed in the districts visited. For example, in one state, SEA Chapter 1 administration is coordinated with special educational programs; the same pattern was found in the three districts visited. In another state, state staff in the curriculum office make decisions about size, scope, and quality and program design issues for Chapter 1. Here too, the pattern was identical in the three districts visited. Curriculum and instruction specialists have primary responsibility for program design, while the Chapter 1 coordinator is concerned with compliance issues and state reporting requirements. Likewise, in the state where supplementary programs are consolidated, district structure reflects that consolidation. The districts visited there noted that the SEA's coordinated compliance reviews, in which SEA program consultants meet, have helped solve several district program coordination problems. Similarly, in the five traditional and one changing state where Chapter 1 is separate from other programs in the SEA, a similar separation was noted in districts (although in very small districts the same person may administer several programs).

The state Chapter 1 office affects district Chapter 1 management in several ways. Perhaps the most important role of state Chapter 1 consultants in school districts is as a visible presence to remind locally funded central office and school officials that the state (and implicitly the federal government) is committed to enforcing regulatory compliance. Several districts cited cases where coordinators brought some district issue to the state consultant's attention so that the consultant in turn could discuss it with district officials or school principals. (A more complete discussion of this function of state monitors is included in Chapter 5.)

Traditional Chapter 1 administrations continue the same program application cycle and requirements (with less detail on parent involvement) as under Title I, while the changing Chapter 1 administrations have streamlined the application. Districts in the state with the consolidated application welcomed the reduced paperwork burden. So did the districts in the changing state that reduced its application form from 39 to three pages. Yet the three districts visited in that state do not keep less application documentation on file than under Title I. The largest district keeps essentially the same documents, it reported, because it is committed to continuing a Title I program. It submits, however, less material to the SEA Chapter 1 office; its application had been 59 pages, but last year was only nine pages.

The program application serves an importance compliance function in all states, but particularly in traditional states, it remains all but unchanged. It is through the program application that state monitors approve program designs, as well as such items as the number of students per class or minutes of instructional time. These aspects of the design are then monitored on site visits.

Little information is available about state influence on specific budget categories within the program application. Only one state -- a traditional state -- sets a limit on the ratio of administrative staff to instructional staff. The limit is called a rule of thumb, but was closely observed in the three districts visited.

In three districts in traditional states, the presence of a section for training staff in such matters as the state application form, program guidelines, and monitoring checklist encouraged local development of in-service training.

Traditional state Chapter 1 administrations are more influential than changing administrations in district program design decisions. Because of strong state concern to avoid audit exceptions, any change in program design in traditional states is subject to close state scrutiny. Such review occurs even in those traditional states that have no preferences about program design. Several districts also noted that traditional Chapter 1 administrations facilitated program design decisions, for example by providing a menu of design options, described in enough detail to enable districts to rethink what designs were allowable (e.g., replacement models for high schools). By contrast, in the changing states, districts do not view the state as an actor in deciding program options (nor did they under Title I). Considerably more variation in design, specifically between pullout, inclass, and mixed models occurs in the changing states. (For a more complete discussion of state roles in program design issues, see the "supplement not supplant" section of Chapter 4.)

Federal Influences

Federal factors for the most part only weakly or indirectly influence local Chapter 1 program design decisions, management, supervision, and training. In only a few districts did they have a more direct influence.

The size of the federal allocation obviously affects the size of both the instructional program and the administrative staff, and many districts experienced administrative staff reductions, either through budget cuts or inflation. (Staffing patterns are detailed in Chapter 2). District administrative budgets, unlike state administrative budgets for Chapter 1, are not set by federal law.

Changes in the federal budget affect district Chapter 1 programs in relatively broad ways. Grade spans or subjects covered will be expanded or narrowed, depending upon whether the budget increases or decreases. In one district in a changing state, greater experimentation with program design was encouraged because of a large increase in the size of its allocations. But few districts experienced such increases. For the most part, the changes were such that the overall program design did not change significantly. Changes in design were more likely to result from district-level influences.

The timeliness with which districts are informed of their next year's federal allocation was noted as important by a few districts. Districts needed exact figures, not ballpark estimates, to know how many teachers to retain and to inform schools whether they would have services the following year. The difference in funds could mean the salary of a teacher or aide, raising the possibility of contractual problems and difficulties reallocating staff among schools.

The federal law and regulations are seldom seen as independent of state interpretation. Thus their influence is indirect, filtered primarily through state communications and monitoring visits. In some instances, federal monitoring and auditing of regulatory compliance more directly influence the proportion of administrative time districts allocate to compliance assurance. These factors were more influential in large districts, which were more likely to be visited by federal teams. Two large districts reported that their dominant management focus is compliance because of monitoring citations and audit exceptions resulting from federal visits.

But federal requirements can be highly influential, particularly when the actions they mandate are clear, run counter to current district practice, and appear likely to be enforced. The most recent example is the Supreme Court's Felton decision, prohibiting public school employees from providing Chapter 1 services on religious owned property. Because of the greater number of nonpublic schools participating in Chapter 1 in larger districts, this decision created greater administrative difficulties and was more likely to result in fewer students and schools served in these districts.*

In at least two districts, lower federal court decisions also had a strong influence. These decisions resulted from discrimination cases and affected Chapter 1 because it serves large numbers of minority students. In one district, the court order led the superintendent to appoint a new Chapter 1 coordinator with a mandate to upgrade Chapter 1 programs. With the superintendent's strong backing, she was able to alter long-established

---

*A more complete discussion of the Felton decision and state and district reaction is found in the appendix volume.

management and supervision patterns with the goal of improving program quality.

CONCLUSION

As we were analyzing influences on current Chapter 1 administration, we were impressed with how little change has occurred between Title I and Chapter 1, except for these changes brought on by the reduced set-aside or reduced allocations. It may be best to conclude this chapter then with an analysis of why administration is largely unaltered, in spite of early predictions to the contrary.

The exceedingly broad and vague statement of state responsibility in Chapter 1 law, coupled with the reduced set-aside, led early analysts to comment that state authority for the program might be lost (McLaughlin, 1982). Chapter 1, section 555(d) stated only that "Each state educational agency shall keep such records and provide such information to the Secretary as shall be required for fiscal audit and program evaluation (consistent with the responsibilities of the Secretary under this Chapter)." Without a clear state mandate for Chapter 1, state governments could now alter SEA structures to create a more functional organization, integrating Chapter 1 programs with state initiatives. State legislatures could also "reappropriate" federal funds -- making agency heads defend their expenditures of federal funds as well as state funds before state appropriation committees -- in an effort to assert more influence (Elmore and McLaughlin, 1982, p. 182).

State and state agency initiatives have not transformed Chapter 1 to the extent imagined. No states changed their organizational structure. The one state consolidating Chapter 1 with other supplemental programs had begun that process before Chapter 1. A few states now do have Chapter 1 staff spending 10 to 20 percent of their time on other duties, not to increase coordination but to offset constrained SEA resources. States also did not change the structure of their relationships with school districts. All but one of the nine states continued the generalist structure: one professional consultant generally responsible for all functions (e.g., monitoring, technical assistance, application approval) for a given number of school districts. Only the state with consolidated programs began coordinated compliance reviews. The reduction in the set-aside diminished the intensity

of state activities and reduced the number of specialist positions. Reductions in staff and functions beyond the set-aside reduction occurred in only one state -- the changing state that sought to deregulate the state role in Chapter 1.

There may be several reasons why so little change has occurred in Chapter 1 administration. First of all, the shift in federal administration is perhaps better characterized as a policy of nonregulation (i.e., nonspecificity) than of deregulation (Darling-Hammond and Marks, 1983, p. xi). Although the Nonregulatory Guidance and Technical Amendments clarified much of the initial ambiguity, a number of states and school districts were reluctant to change practices in case federal auditors at some future time would interpret the law differently. The absence of clear directions, coupled with a continuing audit function, led most states to retain an emphasis on paper compliance activities.

Nor did state and state agency influences force change in traditional states, the bulk of states in our intensive sample. Fiscal conservatism, wariness of audits, and the lack of state initiatives in school improvement reinforced the compliance orientation of state Chapter 1 administration and, with it, close adherence to Title I regulations.

The stability of Chapter 1 administration also precluded much change. Working relationships are well-established, state and local Chapter 1 staff are committed to the program's intents, and professional careers have been built on long tenure in Chapter 1. In addition, embedded procedures inhibit change, either because they are seen as "best practice" or because the resources needed for devising new procedures and training personnel to use them appear excessive.

Among Chapter 1 professionals, it also seemed important to present an image of little change from Title I. When asked directly about changes in administration, state directors and district coordinators of Chapter 1 often said "everything's the same" or "no change," even when budget cuts had clearly reduced staff size and function. An appearance of continuity may be needed to support their position vis-a-vis districts and other state agency personnel. The Chapter 1 director in a state with strong local control, for example, said it was critical that his state agency allow half his staff to become part-time employees so that he could show he had the same number of staff.

Many factors then reinforce stability and the appearance of stability in state Chapter 1 administration. Until state and SEA program initiatives in education are more forcefully pursued, much rethinking of the state role in Chapter 1 administration is unlikely.

CHAPTER 4

CHAPTER 1 ADMINISTRATIVE POLICIES

INTRODUCTION

Administrative policies determine the character of Chapter 1 programs. The fund allocation policies define allowable uses of federal funds and establish who may be served, while the program design policies deal with the duration and intensity of programs and describe how parents and evaluation information are to be included in program design decisions. Administrative policies also include school district and state reporting requirements. When Title I became Chapter 1, these were relaxed with the express purpose of reducing state and local administrative burden. But some interpreted these and other changes as an attempt to broaden the range of those who could be served and to hinder the efforts of state program officials and others to monitor program implementation. There was some fear that it would not be possible to identify where slippage was occurring. Further, concern was expressed that changes in the law would preclude parents and evaluation information from being involved in program design decision.

This chapter explores four fund allocation requirements of Chapter 1: comparability, school targeting, student selection, and "supplement not supplant," as well as the two program design areas of evaluation and parent involvement.* For each requirement, the discussion concentrates on:

- states' interpretation of policy including changes since Chapter 1
- school districts' response to changes in policy
- state influence on district policy

---

*The remaining requirements (maintenance of effort; needs assessment; and size, scope, and quality) are discussed in the appendix volume. They are excluded here because the requirement either is easily met and not burdensome (maintenance of effort), or did not change from Title I to Chapter 1. Those aspects of needs assessment dealing with student selection are discussed under that topic. For a complete discussion of background, current practices, and changes in each policy area, see the appendix volume.

- influence of other factors such as district philosophy or commitment on district policy.

Differences between traditional and changing states are highlighted in the text. The traditional states require more documentation on comparability, and are more concerned with legal issues on program design decisions, than the changing states (see the supplement not supplant discussion). Changing states have retained more evaluation staff, provide more assistance on evaluation, and place more emphasis on evaluation as a program improvement tool than traditional states. Cutoff percentiles for student selection varied more among the districts visited in changing states than in those in traditional states, but this may be related more to the state role in program design than to differences in state policy toward student selection. Districts in the changing states reported that state offices are seldom involved in local design decisions, while districts in the traditional states remarked on the necessity for state approval of program designs. There are no systematic differences between the traditional and the changing states in school targeting or parent involvement. Variation in local policies in these areas appears to be influenced more by district factors than by state factors.

The final section of the chapter looks across policies to address four questions:

- Did the changes reduce paperwork for states and districts? If so, what use is made of the time saved at the district level?
- Have the changes in state and local policy created a drift toward general aid?
- To what extent have parents and evaluation information been included in program design decisions?
- Is the clustering of traditional and changing state Chapter 1 administrations useful in discussing administrative policies?

Two caveats should be kept in mind. First, AAI researchers relied on what states and districts said they do to meet requirements. This is the method used in earlier studies of state and local Title I administration, but it leaves important questions unanswered. The study, for example, cannot

assess whether Chapter 1 and non-Chapter 1 schools have comparable resources since no tests of schools were made. Nor did the study examine school or student eligibility information to check how schools were chosen or whether students were selected in strict rank order of lowest achieving students first. Second, comparisons of districts' policies in traditional and changing states must be viewed as exploratory and tentative. While a substantial amount of time was spent in school districts, including eight to ten person days in the largest district, only three districts were visited in each state -- too few districts to permit generalization.

COMPARABILITY

The intent of the comparability requirement is to ensure that Chapter 1 and non-Chapter 1 schools have the same amount and mix of state and local resources (staff and equipment). If resources are not comparable, districts are to reallocate them to make them so. From Title I to Chapter 1, two important substantive changes occurred. One removed the requirement to make calculations, while the other permitted a less restrictive computation for those who did the calculations. Districts no longer had to compute per pupil expenditures using staff salaries but could use pupil/staff ratios instead.

Significant differences in current policy exist between traditional and changing states. The traditional states all require districts to conduct annual tests of comparability, while the changing states rely on assurances from districts buttressed by documentation of districtwide salary schedules and equipment policies. Because the tests often reveal discrepancies in the resources of Chapter 1 and non-Chapter 1 schools, most large districts in traditional states must reallocate some resources each year, while districts submitting only assurances need not do so. For the medium and large districts in the traditional states, the reduction in administration burden appear moderate, while those in the changing states seem substantial.

State Requirements

While all six traditional states require annual comparability testing, one of them adheres to its Title I policy, including the requirement that per pupil expenditures in Chapter 1 and non-Chapter 1 schools cannot vary

by more than 5 percent. The five others vary somewhat; the most common requirement is that every fall, districts must conduct, in each grade span of each Chapter 1 school, an annual test of staff/student ratios (usually in FTEs) and must compare that ratio with the average staff/student ratio for non-Chapter 1 schools. The two ratios may diverge by 10 percent. Tests are also required when all schools in a grade span receive Chapter 1 services, although the comparison to be made varies from state to state (e.g., with the average of all schools, the poorest school, the least poor school).

All the traditional states review comparability documents on site, although only one recalculates the figures routinely. Two SEAs recalculate at district request (as a hedge against possible audit exceptions), while three do not recalculate. Only one state (the state adhering to Title I policy) requires that reports be submitted to the state agency, while two others request but do not require it.

As noted earlier, the comparability requirements of the changing states differ markedly from those of the traditional states. The changing states require no comparability tests but content themselves with assurances and with district policy statements kept in district files. Two of the changing states check those documents on site, while until this year the third did not. One changing state is predominantly rural, with only 12 districts needing to meet comparability requirements. Another has yet to announce its new policy, but will probably return to Title I requirements this fall to preclude further inquiry by U.S. Department of Education monitoring teams. Two years ago, the first federal monitoring visit instructed this state to require comparability tests, and a second visit last year directed that the same test be conducted in all eligible school districts.

District Responses

All but one district in a sample of 27 need to meet comparability requirements. The one exception is located in a changing state.

Districts follow comparability procedures primarily because the state requires them (and implicitly because of the possible withdrawal of federal funds). Across all large districts, comparability is a highly visible concern, not only because the comparisons are time-consuming and difficult but also because a few have experienced audit exceptions and court cases.

Of the eight large districts in our sample, seven conduct annual tests of schools. Six are in traditional states, while one is in a changing state. The latter maintains Title I requirements in part because of a decade-long court case on its allocation of resources. It is located in the changing state where state policy is likely to return to Title I requirements.

Almost all districts visited in traditional states conduct an annual test of staff/student ratios. The three districts in the state adhering to Title I follow Title I requirements, as does one large district in another traditional state. Only two other districts, both quite small, diverge from the majority. One tests schools four times a year, while the other had not conducted regular tests until the SEA consultant made an issue of it by computing the ratios during a monitoring visit. The district now tests schools annually.

Except for the one large district that maintained Title I requirements, none of the seven remaining districts in the changing states that need to meet comparability requirements do annual tests. They submit assurances and keep policies on file.

Reallocating Resources

Where no tests are conducted, no resources are reallocated. Where tests are conducted, reallocation depends greatly on district size. Only one of the medium or small districts had to reallocate resources (by adding $3,000 to one school's budget) to balance Chapter 1 and non-Chapter 1 schools, while four of the seven large districts must usually do so. One of them moves teachers around every year; another hires new teachers to bring schools into compliance, while a third does not reassign teachers but rather meets some federal program costs from local funds. When the fourth large district found two schools out of compliance, the SEA proposed regrouping the schools. By that method the schools became comparable, and no allocation adjustments were made. Two of the four large districts that reallocate resources continue the Title I requirements.

Administrative Burden

A major intent of the Chapter 1 comparability requirements was to reduce paperwork by relaxing reporting requirements and the need for multiple

tests; by making salary computations optional; and by expanding the permitted variance from 5 to 10 percent. Among the eight large districts visited, no change was reported for the three that followed Title I requirements. Moderate change was reported for the three that tested annually under Chapter 1 requirements. No longer including staff salary data was the primary reason; one district also mentioned time savings through annual testing and the 10 percent variance. Two large districts reported a substantial decrease in burden. One does no testing but merely submits assurances and keeps policies on site; the other cited time savings from a newly developed computerized staff information system and the fact that staff salaries are no longer computed.

The amount of time gained from reduced requirements could not be estimated for the large districts. In one district noting moderate change, for example, all respondents agreed that comparability requirements now took only half as long, but the estimated time saved ranged from .5 person months to 5 person months.

In the changing states, the medium-sized districts noted substantial reductions in burden by no longer conducting tests. In the small districts, the changes were seen as minor.

All 12 medium and small districts visited in the traditional states do comparability calculations. In only one of them were the changed requirements seen to bring substantial reduction in burden. In this medium-sized district, dropping the salary calculations was mentioned, but the primary reason was the shift to an exclusively elementary program serving all schools. Other medium-sized districts reported minor or moderate reductions in burden, due to the absence of salary computations and less report writing. In the small districts, on the other hand, only one program cited even a moderate reduction in burden, which it attributed to less contact with the district's exceptionally poor record keeping system. While time estimates are not precise, it appears that relatively little time is spent on comparability requirements in small and medium-sized districts, ranging from two to five person days a year.

TARGETING: SCHOOL SELECTION

School targeting requirements are designed to concentrate Chapter 1 funds in the poorest schools, although exceptions to selecting only schools below the average districtwide poverty level had already been included in Title I law. Chapter 1 expanded the exceptions somewhat under the 25 percent rate and "no wide variance."* Reporting requirements were also eased, allowing assurances assurances from districts that proper procedures had been followed to replace documentation.

Little change occurred in state policy on school targeting, in either traditional or changing states. The two groups also did not differ on targeting policies, documentation requirements, or restrictions on targeting options. Nor have the districts visited changed their targeting procedures under Chapter 1. The state presents the criteria districts may use in targeting, and continue to require documentation on procedures and a rank order listing of schools. Local factors -- such as district size, poverty distributions, and district goals of serving as many schools as possible -- appear to determine which criteria are applied.

State Policies

Three states -- two traditional and one changing -- impose a given poverty criterion. One traditional state requires districts to use the numbers of children receiving free lunch or free milk, while another requires using the number of students who receive Aid to Families with Dependent Children (AFDC). One of the changing states calculates and ranks all schools using AFDC data; most of its districts use these rankings when available. Long-standing practice in the other six states has been to use free lunch, or free and reduced lunch, as a criterion, since more children qualify for it than for the more restrictive AFDC; thus a state requirement is almost redundant.

*Under Title I, the 25 percent rule could be applied only if the total level of Title I and state compensatory education expenditures in Title I areas served the previous year remained the same or increased. This condition no longer applies under Chapter 1. The "no wide variance" rule was relaxed under Chapter 1 so that the amount of variance allowed in the poverty rankings for the highest and lowest ranked attendance areas is greater.

In general, states do not prohibit use of any federal options for school selection, and also allow the slightly broader interpretation of "no wide variance" introduced with Chapter 1, which made schools above the districtwide poverty average eligible for services.

Only three states -- two traditional and one changing -- restrict federal options. One traditional state, where the statewide poverty average is above 20 percent, prohibits the expanded "no wide variance" and permits no school to be served unless at least 25 percent of its students are on free or reduced lunch. It had the same restriction under Title I, though with a minimum of 30 percent. The other traditional state does not accept "grandfathering" schools -- retaining schools for an additional year although they no longer met the poverty criteria. The one changing state restricts options by not allowing the relaxed standard on "no wide variance" or service to magnet schools.

Eight of the nine states continue to require their districts to document school targeting in applications. Along with the districtwide poverty percentage, districts submit the list of schools ranked by either percent or number in poverty. At least six states require enough information so that SEA consultants can recalculate the figures. The ninth state, a changing state, requires the submission of targeting documentation at a time separate from the application process.

District Responses

Of the 27 districts visited, 21 used either free or free and reduced lunch, usually because it is convenient, allows the most schools to be served, and has been in place for some time. Five of the six remaining districts are located in the two states requiring AFDC counts, and used AFDC records. The sixth district uses free lunch, because AFDC data are not readily available on a school by school basis in this large district.

Very little change was reported in how schools are selected for Chapter 1 service. Two-thirds of the districts in traditional states reported no change, and none of the nine districts located in the changing states had altered their practices. Only one reported a significant change. Prompted by the new Chapter 1 coordinator's desire to serve all elementary schools, this medium-sized district has gone from using free lunch to free and reduced lunch

and has adopted the 25 percent rule. The more generous poverty criterion allowed more schools to become eligible under the 25 percent rule.

Three of the large districts slightly changed their targeting, all in the direction of serving more schools. Two adopted the 25 percent rule. Both sought to serve more schools; one also hoped to simplify its problem of non-comparable resources between Chapter 1 and non-Chapter 1 schools. The third had shifted in 1980 from using AFDC to free and reduced lunch; when money again became tight, it reduced the grade span (to grades 1-3) rather than remove services from schools.

The only other district to change targeting practices was a medium-sized district that had experienced substantial school closings. In order to continue services to Chapter 1 students transferred to a formerly ineligible school, the Chapter 1 director shifted from using AFDC to 70 percent poverty and 30 percent free lunch to make the school eligible. Because AFDC was the state requirement, he first obtained permission from the State Chapter 1 director.

Across all districts, the proportion of Chapter 1 schools to all public schools in the chosen grade spans went from 63 percent in 1980-81 to 68 percent in 1984-85, not a significant change. There were no appreciable differences between districts in changing and traditional states. Our 27 district sample is too small for generalizing across districts, but it does raise a question about whether Chapter 1 funds are concentrated in the poorest schools in a district when two-thirds of all public schools in the grade spans covered receive services.

The main roles of the state in targeting are to convey to districts what options are allowable and to ensure fidelity with basic selection procedures. The options then chosen appear to reflect district characteristics and objectives -- e.g., size of district, distribution of poverty, a desire to serve as many schools as possible.

TARGETING: STUDENT SELECTION

Changes in Chapter 1 language on student selection were initially viewed as opening the door to dispersing services over more students, including some that were less needy. Although the 1983 Technical Amendments

clarified that the students in greatest need were to be served, they did not expressly define "in greatest need" as "furthest behind." Most states continued as they had under Title I; only one state, a traditional state, now allows teachers to select students from among the eligible pool rather than strictly by rank order.

State Policies

At the state level, policies and practices have remained virtually unchanged in two-thirds of both the traditional and the changing states. All require information on the selection measures used, including cutoff scores, and the number of students to be served in each school. All but one state continue careful site review of ranked lists of students. Of the two traditional states showing some change, one moved to assurances from districts that proper procedures are followed (it reports that it "eyeballs cutoff scores like a hawk" on monitoring visits), while another requires stricter adherence to the cutoff score but allows somewhat more flexibility in choosing among eligible students. This is the only state that does not require or "strongly encourage" serving students in rank order, starting with the lowest achieving. One traditional state requires slightly less documentation in the application but asks for it during site monitoring. One changing state shifted its policies to allow assurances. At first, it conducted little site monitoring, but has increased on site work on instructions from federal monitors.

Most states do not rely exclusively on test scores for selecting students. All but two -- one traditional and one changing -- now urge that test scores be supplemented with other measures such as quantified teacher judgments, points for failing certain subjects, or points for being retained in grade. In one state where the state director is leery of standardized test scores, teachers first recommend students who are then tested. Whatever the method used, students are to be ranked and then selected "from the bottom up" (except in the one state that introduced teacher discretion after testing).

There appears to be some difference between traditional and changing states on mandated cutoff percentiles. Traditional states are somewhat more likely to either encourage or require lower cutoff percentiles than the changing states. Four of the six traditional states specify a cutoff of the

40th percentile or below, while only one of the three changing states specifies the 40th percentile. The others require student selection below the 50th percentile.

Two traditional states had very specific requirements. One "strongly suggested" concentrating on the youngest students and using the 36th percentile as a cutoff, while another required districts to use the California Achievement Test and to serve students in groups: those below the 22nd percentile first, then those between the 22nd and 38th percentile, and finally those between the 39th and 49th percentile.

District Responses

As is the case with other fund allocation requirements, district practices observe at least the minimum required by the state. For example, in the state strongly suggesting the 36th percentile as the cutoff, all three districts visited selected students strictly in rank order and included only students from the 36th percentile or below. All three had sought to raise the cutoff score, and one had tried to start a "transitional" program for those above the 36th percentile, but the state agency had denied their requests. In these districts, the strong recommendation of the state Chapter 1 office is seen as a requirement. In the traditional state requiring students to be grouped according to severity of need, the three districts visited classified students as having severe, moderate, or slight need and provided more intensive services to those most in need. Those with slight need, for example, received only after-school services, and then only if all students in the more severe categories were served first.

Again, the sample of districts visited is too small to generalize, but it appears that student selection cutoffs vary more in the changing states than in the traditional states. For example, in the changing state where all supplemental services have been consolidated, all three districts use only standardized tests and select the lowest achieving students first, but the program options vary. The large district concentrates more resources in very poor schools; the medium-sized district serves all students below the 49th percentile in a narrow grade span; and the small district serves all students below the 25th percentile. The variation may be related to the state role in program design. As pointed out in the following discussion of "supplement not

supplant," changing states are generally not consulted about local program design decisions, while districts in traditional states stress the necessity of state approval. Program designs in changing states are more varied than in traditional states. Whether in-class or pullout programs are used has implications for how many children are served and therefore to the cutoff scores used.

Variability among districts in traditional states usually stems from differences in size. Large districts are somewhat less likely to use quantified measures of teacher judgement for student selection. They are more likely to use only test scores and perhaps previous Chapter 1 enrollment, and to target the lowest achieving schools for additional resources.

The differences cited above are not a consequence of Chapter 1 law. All districts reported either no or minor changes in student selection from Title I.

Across most districts visited, few Chapter 1 students were reported as being either handicapped or bilingual. Such students usually received services under other funds, although one metropolitan district had started a special pilot program for handicapped Chapter 1 students. In general, handicapped students could receive Chapter 1 services once the district had met their core requirements. In several districts, Chapter 1 was sometimes seen as a pool from which to select children for handicapped services, especially if they scored below the 15th percentile. The smaller class size also enabled children to be observed more closely. In districts in two states, however, handicapped students appeared to be excluded from Chapter 1, and one of these states explicitly prohibited handicapped children in Chapter 1 classes, although a few occasionally appeared through special state waivers. This state feared that Chapter 1 funds supplanted funds for special education students, which were reported to be ample.

Federal law and state interpretation appear to have their strongest influence on student selection by setting the outer limits (e.g., students must be selected below the 50th percentile) and proposing the general philosophy (i.e. retaining the Title I intent to serve the lowest achieving students first).

Selecting Students in Greatest Need

Changes in Chapter 1 appear to have caused no dispersion of services over a greater number of students; districts appear to pay close attention to selecting students only below the cutoff score, which was often set below the usual SEA limit of the 49th percentile.

With a few exceptions, districts also reported that they selected students "from the bottom up"; there seemed to be general agreement that Chapter 1 was a program for those in greatest need, although only an audit of the records can verify this. One traditional state now allows more teacher discretion in defining "greatest need"; thus some higher scoring students may receive services before lower scoring ones if teachers believe that the scores do not accurately reflect student achievement. In two other districts, teachers wanted to teach those around the 35th percentile; but those in greatest need are served with Chapter 1 funds, and local funds provide supplemental services to students between the 35th and 49th percentiles. Finally, one small school district had under Title I struck a "balance between greatest need and most likely to benefit," but in 1982, at the insistence of a new superintendent, returned to serving those with the greatest need.

SUPPLEMENT NOT SUPPLANT

The "supplement, not supplant" requirement is to ensure that Chapter 1 programs are offered in addition to, not instead of, state and locally funded services. Although never a federal requirement, pullout programs often were considered the best way to demonstrate that programs were supplemental under Title I, and some states therefore required them. The Chapter 1 legislation explicitly states that pullout programs cannot be required as a means of ensuring that services are supplementary.

State Policies on Program Design

Two-thirds of the traditional and changing states had a preferred program design. Of the four traditional states in this group, three prefer pullout programs, because they are usually easier to monitor and tend to prevent misuse of aides' time. One state called pullout programs educationally better. Both changing states with preferences, on the other hand, favor in-class programs, stating that they are educationally better and less disruptive

to children's time; but only one of these states actively encourages in-class programs. Two traditional states have no stated preference, although one favors pullouts in districts that have a history of supplanting.

Traditional and changing states differ less in program preference than in whether that preference is communicated to districts. In the traditional states, districts tended to remark on the necessity for state approval and occasionally had difficulty obtaining approval for changing their program design, even when the state Chapter 1 office had no strong design preference. Approval would eventually be granted, but districts had to show that program designs were indeed supplementary. By contrast, districts in the changing states did not expect to consult the state office about program design decisions and regarded it as having little say in the matter.

District Program Design

Whether in traditional or changing states, districts operate for the most part in keeping with state Chapter 1 office preferences but for reasons of their own. In one traditional state, however, all three districts visited cited the state's preference as the major reason for choosing the pullout design. Decisions about program design are typically negotiated among the district office, the Chapter 1 program office, and individual principals. These decisions take into account budget considerations, a district's philosophy about using certified professionals or aides, and availability of additional classrooms.

Almost three-fourths (13) of the districts in the traditional states use the pullout model either mainly or exclusively. Of the two districts using primarily in-class programs, one is located in the traditional state encouraging these programs, while the other is in a state where the SEA consultant prefers them for economic reasons. Of the three districts with a mixed design (i.e., no preference), two are located in the state preferring in-class programs, while the other is in a state with no preference. The pattern of program design does not vary with district size. Four of the six metropolitan districts have primarily pullouts, while one has a mixed design and one uses primarily an in-class model.

Districts in the changing states are more likely to use a range of programs. Four use mainly pullouts, three use mixed designs, and the

remaining two use in-class programs. Those with mixed designs are all from the state that does not push its preference for in-class programs. In the changing state preferring in-class programs, only one district uses such a program, and it was not aware of the state's preference. Programs in the third changing state are all different from each other. Of the two large districts in the changing states, one has primarily a pullout program while the other has a mixed design.

State and District Policy on the Compensatory Education Exclusion

Chapter 1 also reversed a Title I requirement that included state and local compensatory education funds in the funds Chapter 1 had to supplement. Our data present rather sketchy information on the extent to which the exclusion is known and used.

Four states -- two traditional and two changing -- have state compensatory education programs. In two of them -- one traditional and one changing -- the exclusion for state compensatory education is seldom used, since state Chapter 1 guidelines require that virtually all state funds be targeted for students in junior and senior high schools, with federal funds used in the elementary grades. In the remaining changing state, only the metropolitan district in our sample received state compensatory education funds. These were distributed to the lowest achieving schools first. When they were exhausted, Chapter 1 funds were distributed, so there was little overlap of schools. In the remaining traditional state, the exclusion does not apply for the metropolitan district since Chapter 1 is restricted to elementary grades, with state funds going into the middle and high schools. In the medium and small districts visited in this state, it appears that unserved eligible children in Chapter 1 schools receive state compensatory education funds first, and further schools eligible for Chapter 1 are added as funds permit.

About one-fifth (6) of the districts visited have local compensatory education funds but no state funds. The local contribution is quite small, and it was not clear whether the new exclusion affects how resources are allocated in these districts.

In districts with either state or local compensatory education funds, coordinators were hazy about whether they were using the exclusion,

perhaps because state Chapter 1 staff have not clearly explained this section of the law or do not raise it in monitoring visits. In many districts visited, what is monitored under "supplement, not supplant" often appears to be the general aid provisions (e.g., that aides work only with Chapter 1 students, or that Chapter 1 teachers and aides spend no more than 10 percent of their time on general school duties) rather than whether Chapter 1 students get their fair share of state and local resources.

EVALUATION

Chapter 1 retained the general requirements for evaluation, but the federal government no longer mandated the use of TIERS (Title I Evaluation Reporting System) or the RMC evaluation models. That is, while evaluation was required, the national data base for Chapter 1 evaluation was not. States typically responded by maintaining the national reporting system, so that Congress would have evaluation data when considering continued program funding.

State Policies

Within the nine states studied intensively, very little change in state policies toward evaluation occurred. Four of the nine (including all three changing states) require the RMC Model A, while the other five strongly recommend it. Only two traditional states no longer require districts to report annually, yet districts in these states continue their annual submissions.

Differences between the traditional and changing states occur with shifts in SEA staffing for evaluation. Only one traditional state still has a full-time evaluator on the state Chapter 1 staff, whereas all three changing states retained at least one full-time evaluation position. This is a shift for traditional states since Chapter 1: all but one had at least one full-time evaluator under Title I. The traditional states have either merged evaluation responsibilities with compliance monitoring or have no expertise at the state level, relying instead on occasional support from Technical Assistance Centers (TACs) or expertise in the largest school districts.

Traditional and changing states also vary somewhat in their views toward sustained gains studies. The three changing states require such

studies, and one of them is beginning this year to request district data for a state data base. Three of the six traditional states require sustained gains studies every three years, though one sees them solely as a formality. One other traditional state is now asking districts to do sustained gains studies; another recommends but does not require them; and the last does not require them since the state director sees no value in them.

The changing states, for the most part, provide more assistance on evaluation to districts than do the traditional states, especially assistance for tying evaluation data into program improvement. One of the changing states has a highly sophisticated evaluation staff who offer 40 workshops a year on linking evaluation with curriculum areas. Another analyzes raw scores for districts upon request (about 30 percent of the districts submit data for analysis), prepares annual reports on the effectiveness of various program approaches, is compiling a state longitudinal Chapter 1 data base, and checks the validity of district work. The third provides technical assistance encouraging evaluation use, but little information is yet available on its effectiveness. The traditional states, on the other hand, concentrate primarily on evaluation procedures and reporting requirements, although the state with a full-time evaluator provides some technical assistance on sustained gains studies. One predominantly rural state analyzes raw scores at grade level within schools for its districts and prepares a district-by-district state report; another state has conducted a few regional workshops encouraging local evaluation use. In general, changing states have more evaluation staff and in-house expertise and link evaluation more closely with program improvement.

A number of factors seem to influence state activities in Chapter 1 evaluation. For traditional states, the main factor appears to be institutionalization: the procedures are already in place, and state and district staff are well versed in what is required. State testing programs in several of the states reinforce the maintenance of Chapter 1 evaluation procedures. Wariness of federal motives also appeared as a factor in several states, either because the history of changing federal requirements induced hesitation or because of fears that further budget cuts would ensue if no evaluation data were available for Congress. The one traditional state with a

full-time evaluator stated that staff expertise enabled them to give districts more help and to be more vigilant toward district practices.

Institutionalization also appears to influence evaluation policy in changing states, but not as strongly. For two states, the high quality of the SEA testing and evaluation staff and the strong state commitment to evaluation appear more important, while the third state, which has a history of local involvement in state policy making, appears to respond to districts' desire to retain evaluation procedures. In the changing state that consolidated all supplemental programs, a new state law requiring annual evaluation of state compensatory education and state improvement programs is applied to Chapter 1 programs as well. Changes in Chapter 1 evaluation requirements had little impact in this state.

District Responses

Visits to school districts within the nine states confirmed the retention of Title I evaluation reporting requirements. All 27 districts visited in the nine states test Chapter 1 students annually using Model A1 and transmit scores to the state Chapter 1 office. Sustained gains studies have been carried out in all but one large district, although one district has done no analysis since 1979. The large district not doing sustained gains studies was told "not to worry about it" by the state Chapter 1 office. About two-thirds of the medium and small districts do sustained gains studies. The smaller districts were somewhat less likely to do so if not required to, and if the district Chapter 1 director had little evaluation expertise.

The main change in evaluation since Chapter 1 has occurred in large districts, where six of the eight have experienced staff shifts. Five have had reductions in staff, while the sixth has had an increase (resulting from a court-ordered desegregation mandate to raise test scores). The five former are all in traditional states, but it is unclear whether state policy influenced the cuts. The cuts have reduced the time evaluators spend in schools and their ability to respond to school requests for analysis. One district appears to be offsetting the reductions through newly purchased

computer equipment, while another is using more sophisticated but less labor-intensive procedures.

Only five districts of the 27 have changed their tests or testing schedules since Chapter 1 was passed. Three have done so at state urging -- two districts in a changing state went to spring/spring testing and one in a traditional state went from spring/spring back to fall/spring testing. A fourth district changed to spring/spring testing through school district pressure. One district adopted the state mandated test to reduce the testing burden on students.

Because districts for the most part maintain Title I evaluation practices, the burden on districts did not change with Chapter 1 except in districts that changed their testing cycles. The districts going to spring/spring testing have a slightly reduced burden while the district returning to fall/spring testing has an increased burden. One district mentioned an increased burden from collecting age, sex, and race data on Chapter 1 students.

The Title I evaluation requirements led to the development of certain core evaluation activities in districts -- the RMC models and the TIERS reporting system -- supplemented with technical assistance from the TACs. These continue as Chapter 1 evaluation activities, in part because state administrations strongly encourage districts use TIERS so data results can be aggregated to the national level for Congressional hearings. The influence of federal factors then dominated in creating the system, but are less important now. Federal factors influence continued operation primary through the regional TACs, that provide both evaluation and program improvement services.

State influence in evaluation appears marginal, beyond transmitting federal Title I intent. States can mandate a particular test or testing schedule (although these are usually coordinated with district schedules), but play little role in whether districts use evaluation for program purposes. This was true across both traditional and changing states. Although two of the three changing states have active and sophisticated evaluation offices, the districts visited conducted and used no more evaluations than districts in the traditional states. In fact, the only reported state influence (beyond minimal requirements) was in the one traditional state that feels strongly

committed to evaluation and maintains a full-time evaluator. It may be too soon to assess whether the strong state capacity in evaluation will affect districts in the changing states, since these states have only recently compiled and released information on effective practices.

Whether districts do more than pre- and post-testing of students or use evaluation information for program purposes depends on local factors: district size, the presence of highly skilled evaluation staff, and either district or Chapter 1 interest in and commitment to evaluation.

All but one of the eight large districts are sophisticated about evaluation, do considerably more than the state requires, and use evaluation information in program decisions. The medium and small districts are less likely to use the summative Model A information or to undertake additional work, especially if they do not have evaluation staff in the district. About one-third of these 19 districts use evaluation information to guide their program, usually in diagnosing individual student needs or in revising the program design based on longitudinal studies of student progress.

Across all districts, the additional evaluation activities undertaken through Chapter 1 include effectiveness studies of particular program types (e.g., pullout vs in-class) and time-on-task studies, as well as supplemental analyses such as longitudinal studies of student progress and subtest and item analysis for curriculum planning and student diagnosis.

The most common uses of evaluation information are for program design decisions (e.g., keeping more expensive programs that have higher gains, shifting instructional time based on teacher time-on-task studies, or simply "knowing where the program stands"); individual student diagnosis and prescription (e.g., analyzing longitudinal student data to see whether scores have been consistently low, or whether a sudden drop in scores indicates another problem); and general feedback to parents, teachers, and school boards. In addition three of the large districts (but none of the medium or small districts) mentioned that demonstrating gains reinforced the Chapter 1 director's authority and helped prevent district officials from interfering with the program. "We can do as we want," said one Chapter 1 teacher, "as long as we continue to show good gains." Although the sample is small, this political use of evaluation was more likely to be found in the large than in the smaller districts.

PARENT INVOLVEMENT

When Title I first passed in the mid-1960's, parent involvement was intended in part to enable low income parents to monitor school districts reluctant to provide services to their children. When Title I was last amended, in 1978, parent involvement had evolved into elected school and district Parent Advisory Councils (PACs) that were less monitors of the program than advocates for continued funding. Chapter 1 eliminated parent involvement requirements, leaving only a mandate to "consult with parents" that could be satisfied with one annual public meeting. Parent involvement activities have dropped at both the state and district level and, although this was not specifically intended by the law, paperwork has been somewhat reduced.

States responded to changes in parent involvement requirements in one of three ways: requiring district PACs; requiring the minimal annual open meeting; or requiring an open meeting while also recommending various parent involvement activities. These patterns were found in both traditional and changing states. Whether districts did more than the minimum in a given state depended on local factors that were usually associated with size: a history of parent involvement in schools or community politics, and the interest and commitment of local Chapter 1 staff and teachers.

State Policies

Three states -- two traditional and one changing -- require district PACs or an alternative. The two traditional states require Chapter 1 PACs. The changing state requires PACs if districts and schools receive state compensatory education funds, although PACs are not restricted to Chapter 1 parents. Requirements specific to Chapter 1 are an annual meeting and review of plans and expenditures. Two of these states have had a long-term interest in parent involvement in schools, although one now exerts less pressure on districts where parent involvement has been a problem because of the reduced requirements. The third state has a history of active civil rights enforcement and a Chapter 1 director and staff strongly in favor of parent involvement.

Four states -- three traditional and one changing -- require only an annual meeting, and cited district difficulties in complying with Title I requirements as the main reason for relaxing requirements. Two are predominantly rural with scattered small districts, while in another the SEA has traditionally had little interest in parent involvement.

The remaining two states -- one traditional and one changing -- require an open meeting annually while also recommending various activities. The traditional state Chapter 1 program, which distributes literature on model programs and suggests parent involvement activities, is housed in an SEA active in early childhood education. While the Title I PAC requirements were seen by the SEA as interference in school districts, the Chapter 1 office is strongly committed to encouraging parent involvement as a sound educational approach. The changing state in this group stresses parent involvement in its policy handbook and strongly encourages PACs, parent involvement with children's educational plans, and parent volunteers in schools. The state Chapter 1 staff strongly favor parent involvement but lack the political power vis-a-vis school districts to augment federal rules. Curiously, all three districts visited in this state hold two parent/Chapter 1 teacher conferences each year because, they say, the state requires them.

District Responses

All districts visited do at least the minimum required for compliance. All hold at least one annual meeting, and in the states requiring PACs (or an alternative), districts have organized PACs. The nature and level of parent involvement in school districts appears to be much less influenced by state characteristics than by local factors. Large districts, for example, generally have large active district PACs. Six large districts -- four in traditional and two in changing states -- have some quite active school PACs. Two PACs focus primarily on district budget issues and lobbying for Chapter 1 support; five others combine political advocacy with parent involvement in school and child activities; and one (in a state requiring a district PAC) concentrates on parents working with children in individual schools, the district PAC playing a largely symbolic role. Curiously, two of the large districts with active PACs claimed that the SEA required the PAC, although the SEA staff said that only annual meetings were required.

District PACs appear to be most active in large urban school systems and in districts with a history of community involvement in education. The political involvement of community members has carried over into Chapter 1, and several of the large city PACs have political success stories as allies of the Chapter 1 program. In one case, the PAC brought in the local Congressman to resolve a dispute between the district and the SEA. In another, the PAC chair and a contingent of parents went before the school board protesting a city proposal to raise from 5 to 15 percent the indirect cost rate charged to the Chapter 1 project. After statistics were presented on the numbers of children who would no longer receive services, the proposed raise was withdrawn. District PACs in large districts focus little on program design and implementation.

The medium-sized districts generally have less active district PACs and concentrate their activities within schools. A third are quite actively involved with parent/teacher consultations, volunteer programs for parents in the school, reading fairs, family/child reading nights, and speaker programs. The others have more modest school based activity, usually presenting Chapter 1 information at PTA meetings. Recent popular attention to improving schools was cited as influencing the increase in school based parent activities.

Small districts have very little parent involvement activity, whether through PACs or other parent involvement efforts. None has retained school PACs. Three of the 10 small districts have district PACs; one is fairly active but two serve largely symbolic functions and exist because the state requires them. One small district had more active parent involvement when the Title I parent coordinator was an experienced teacher. On the SEA monitor's recommendation, the position was taken over by a part-time paraprofessional, and parent activities dropped off. With this exception, the small districts experienced little real change from Title I to Chapter 1.

Parent involvement seems highly dependent on traditional parental interest in schools (or in community politics) and on the commitment of local Chapter 1 staff and teachers. The large districts are more likely to have politically active PACs serving as Chapter 1 program advocates while activity in medium-sized districts appears more school focused. Small districts in our sample generally report little parent involvement activity.

State and federal policies appear to have served as an enabling mechanism in those districts where some interest and commitment exist. Several state and district Chapter 1 staff as well as PAC chairs stated that the changed requirements for parent involvement have now weakened the legitimacy of their activity. Changes in the law, they contend, have also led to cuts in staff and to reduced budgets. It was not uncommon to have funds for parent activities to be halved, including funds for paid parent coordinators or liaisons that several districts claimed were needed to foster parent involvement. They also said that they now had less political clout in working with reluctant principals. Supporters of parent involvement contend that the reduced parent activities and budget will have a long-term negative effect on the quality of the program. They urged stronger language in the law to support parent involvement, especially in school related activities. They did not urge a reversion to school-level PACs or election of parents to councils.

POLICY ISSUES

When Title I became Chapter 1, one purpose was to reduce state and local administrative burden, especially paperwork burden. Others were concerned the changes would broaden the range of schools and students served, and would also hinder efforts by state and local officials and others to monitor program implementation, including whether Chapter 1 funds were used for general aid. Further, changes in evaluation and parent involvement were seen by some as reducing the prospects of parents and evaluation information being included in program design decisions. This section addresses each of these matters in turn. The section concludes with a methodological note, assessing the usefulness of the clustering of traditional and changing states.

Did the Changes in Chapter 1 Law Reduce Paperwork for States and Districts? If So, What Use Is Made of the Time Saved at the District Level?

For the most part, the Chapter 1 law did not reduce the paperwork burden on school districts. In no district did time savings produce a reallocation of resources. Reductions in paperwork appeared only in comparability and parent involvement, with the large districts showing the most savings. These two areas will be discussed in some detail, followed by

school targeting, student selection, and evaluation. An analysis of why changes overall were so minor concludes this section.

Meeting comparability criteria is a large-district issue, and the impetus for changing the computations required and reducing paperwork came from large districts. Size and political considerations in these districts make comparability one of the most time-consuming Chapter 1 administrative requirements. Tallying figures is a laborious task unless districts have centralized personnel data banks, since the calculations require data from scores or even hundreds of schools. Politically, comparability is more difficult than other requirements since reallocating resources affects not only Chapter 1 schools, but all schools in a district, and shifts in personnel must take place while the school year is under way. Comparability requirements then affect district staff paid out of local funds, not only Chapter 1 staff. Four of the seven large districts in the sample have had to reallocate resources after the annual test. One district shifted to the 25 percent rule to increase the number of Chapter 1 schools, solely to meet the comparability criterion; no educational reasons entered into the decision, and some school officials voiced concern about diluting services to individual schools as a result.

Changes in comparability requirements somewhat eased the paperwork burden on the large districts. In the four districts shifting to an annual test of staff/student ratios, the paperwork reduction appears moderate, primarily because staff salaries no longer had to be included. The large district shifting to assurances only (with no test) seems to have a substantially reduced burden. The other three large districts continued Title I requirements, and so had no reduction.

In large districts, estimates of time saved varied. Estimates for the current year were further muddled by the substantial investments these districts are making in response to the Felton decision prohibiting Chapter 1 teachers on religious-owned property. The small and medium districts in our sample were able to implement the decision fairly easily, but the large districts have still not resolved how to provide off-site services to students in nonpublic schools. (See the appendix volume for a more extensive discussion of this topic.)

For medium districts, on the other hand, the reduction in burden was mostly minor, unless the district had shifted to the use of assurances only, with no test. The time spent on comparability is said to range from two to five person days. Small districts reported no reduction, even if they shifted to assurances, mostly because they had never spent much time on comparability requirements.

At the state level, states shifting to assurances saved more staff time, especially in the three states where districts do not conduct annual tests; but in general, savings were minor. On-site monitoring continues to include review of comparability data, and three states in the nine state sample either require or request reports.

Reduced parent involvement requirements reduced primarily the activities themselves but also had implication for paperwork. While all large districts continue district PACs, only a third of the medium-sized districts and only one small districts still have active parent involvement. Time saved was usually absorbed through staff cuts in the large and medium districts, while in small districts these activities had never taken much time. Few mourn the loss of elected or school based councils, but some Chapter 1 staff and PAC chairs feel that changes in the law have weakened the legitimacy of parent involvement in the program.

Districts made few changes in school targeting or student selection, although three states -- two traditional and one changing -- no longer require data in program applications. This move to using assurances has had little effect in districts in the two traditional states, since both prescribe selection options and require documentation on site. The one changing state had also eliminated on-site monitoring until federal teams directed that it be reinstated. District practice has remained unaltered.

Chapter 1 evaluation requirements also brought no reduction in paperwork for districts or states. Districts continue the same activities, including annual submission of pre- and post-test results. State activity is reduced somewhat due to reduction in the state administrative set-aside, but paperwork has not changed.

In summary, reductions in paperwork appear for only two policy areas -- comparability and parent involvement -- and are related to district size.

The greatest savings were seen in the large and medium districts no longer testing comparability. For large districts testing comparability, reductions were moderate. No longer using staff salaries reduced the time burden, but calculations had to be retained on file (and in some cases submitted in comparability reports to the state). Reduced parent involvement activities also reduced paperwork somewhat, especially on elections to councils. These savings are more likely to appear in the larger districts. Otherwise, the paperwork burden at both the state and district level remains unchanged.

There are several reasons why changes in the Chapter 1 law failed, for the most part, to reduce the paperwork burden. First, auditing and monitors continued to require a clear paper trail. For example, although school targeting options were broadened somewhat, worksheets with schools ranked by poverty and documentation on procedures are still submitted. Student targeting changed little, and ranked lists of students are kept on file for state review. In most states, comparability data are required on site as well, except for the explicit exclusion of salary data. Second, general requirements for evaluation remain even if specifics have been dropped. All projects have to evaluate their programs using some objective measure of achievement. Although the RMC models and TIERS reporting are no longer mandated, they are already in place, can easily be continued, and are known to be legal, and so continue to be used. Districts also retain the models in part because of states' interest in maintaining them for Congressional use. A final reason for the limited savings is that change creates a burden of its own. Substantial energy must be expended in designing new procedures and reporting formats and in training people how to use them. States and districts may have been reluctant to invest such energy, especially with the initial uncertainty and confusion about the Chapter 1 provisions.

Have the Changes in State and Local Policy Created a Drift Toward General Aid?

When Chapter 1 was passed, changes in wording and reduced reporting requirements were seen by some as expanding program boundaries on who could be served, and potentially hindering the monitoring of policy implementation. Reports by state and local Chapter 1 directors suggest that changes have not so far led to much spread in services or to much slippage toward general aid. Little change has been made in Title I policies, owing to initial

uncertainty and to a commitment to Title I supplemental services. The 1983 Technical Amendments also clarified school and student targeting requirements, reducing the concern about expanded program boundaries.

Changes in individual policies do, however, warrant closer inspection. Comparability requirements are perhaps the most serious. In the three changing states where districts do not test, but rather keep policies on file and submit assurances, no resources have had to be reallocated. Yet large districts, and to a lesser extent medium-sized districts, in the states where tests are required have often had to reallocate resources to balance staff/student ratios among Chapter 1 and non-Chapter 1 schools. This does not mean that the two sets of schools in the changing states are not comparable, but rather that the state cannot assure that comparability requirements have been met.

Procedures for targeting schools have altered very little, and there have been few shifts in schools served. In our small sample of districts, Chapter 1 schools comprise about two-thirds of all schools in the grade spans served, a proportion that has not significantly changed since Title I. In the four districts that expanded somewhat the number of schools served, all used the 25 percent rule that under Chapter 1 no longer requires the same or increased total expenditures of Chapter 1 and state compensatory education funds in attendance areas served the previous year. Most districts continue to use free and reduced lunch in defining poverty, a more generous (and easier) measure for reaching 25 percent poverty. Pressures to find most schools eligible and to provide them with continuing services are exceptionally strong forces in our sample of districts. These pressures are not new to Chapter 1.

In our sample of districts, we saw no indication that Chapter 1 services are dispersed over a greater number of students. Districts reported paying close attention to selecting students only below the cutoff score, and that score was often well below the 49th percentile. No change was reported since Chapter 1 passed, although one state allowed teachers some discretion in choosing students out of rank order. The AAI study design did not include review of selection worksheets or independent tests of student selection to check whether the lowest achieving students were selected first, which would provide more complete information.

In neither school targeting nor student selection have reporting requirements changed. The one state that has moved to assurances only is now reinstating on-site document review. States thus appear to have the same documents available to detect compliance slippage in these areas as under Title I.

The role of parents as watchdogs or monitors to prevent general aid may have been the original intent of Title I in the mid-1960's, but was seldom practiced under Title I (AdTech, 1983; CPI Associates, 1979; Hinkley, 1979; Wang, 1978). It was also not in evidence in the districts visited by AAI researchers. Where parents did advocacy work, it was as advocates for the program; several metropolitan PACs engaged in independent fundraising to support Congressional lobbying efforts for additional Chapter 1 funds. The reduction in parent involvement requirements resulted in staff cuts at the state and district level and in reduced budgets for parent activities, but it did not affect a monitoring function that was seldom realized.

Overall, it thus appears that changes in the wording of administrative policies and in reporting requirements have not caused noticeable slippage to general aid. Changes have however introduced some uncertainty about comparability in those states where data are not available; and the parent involvement role in Chapter 1 is now more limited.

To What Extent Have Parents and Evaluation Information Been Included in Program Design Decisions?

Parents were seldom involved in program design decisions even under Title I (AdTech, 1983; CPI Associates, 1979; Hinkley, 1979; Wang, 1978). We found a similar pattern, with districts often defining "to consult with parents" as "to inform parents" about the Chapter 1 program. There are a few notable exceptions (in districts of all sizes), where PACs thoroughly review program applications and make recommendations that are carefully considered and often adopted by Chapter 1 directors. But the more typical pattern in districts where parents are active is to see them engaged either in political advocacy for the program or in activities focused on their own children. These districts reported a substantial reduction in parent activity as a consequence of the changes in Chapter 1 law and see this reduction as having a long-term negative effect on the quality of the program.

Evaluation information has been used for program improvement primarily in large districts, although some rather creative uses were found in some of the smallest districts in our sample. All but one of the eight large districts but only about one-third of the medium and small districts report using evaluation information in program design decisions (including a general assessment of "how we are doing"); for individual student diagnosis; or in general feedback to parents, teachers, and school boards. These findings are consistent with those from earlier research on the uses of Title I evaluation information in school districts (AdTech, 1983; David, 1978; Boruch and Cordray, 1980; Kennedy, Apling and Neumann, 1980).

Since Chapter 1 was passed, five of the eight large districts in our sample have experienced staff cuts in evaluation, reducing the time evaluators spend in schools and limiting their ability to respond to school requests for analysis. These cuts could likely erode the utility of Chapter 1 evaluation information in program improvement efforts.

Districts looking to state Chapter 1 staff for aid in using evaluation information are more likely to find it in changing than traditional Chapter 1 administrations. Evaluation know-how in traditional state Chapter 1 administrations is greatly reduced under Chapter 1. The three changing states, on the other hand, maintain evaluation personnel, provide technical assistance on how to use evaluation results, and are better equipped than traditional states to use evaluation data to identify effective practices.

Is the Clustering of Traditional and Changing State Chapter 1 Administrations Useful in Discussing Administrative Policies?

The clustering of traditional and changing state Chapter 1 administrations, developed in Chapter 3, was based on differences in administrative practices, such as monitoring and technical assistance, that were found in the nine states. Its use was descriptive rather than explanatory. In future research on state and local Chapter 1 administration, it may be useful to test the limits of clustering. Selecting states on the basis of differences in their administrative practices and policies and then systematically exploring the reasons for these differences would provide a sounder basis for understanding diversity in Chapter 1 administration.

Analyzing how useful the clustering is in discussing state administrative policies in this sample of nine states helps point out its strengths and limits. As detailed below, the concern for legality and focus on documentation in traditional state administrations is reflected in the substance of state policies toward comparability and supplement not supplant, while the somewhat stronger focus on technical assistance for program improvement in changing states may be mirrored in their particular focus on evaluation.

Traditional state Chapter 1 administrations require more documentation, and hold districts to a more stringent compliance standard on comparability, than do changing administrations, by requiring annual testing rather than merely that district policies be kept on file. Unlike changing states, traditional states exercise approval authority over changes in program design to ensure their legality. Traditional states are also more likely to prefer pullout programs, and to do so because they are easier to monitor or prevent misuse of aides' times.

These differences are consistent with the clustering of administrative practices discussed in Chapter 3. The greater concern for documentation and more active focus on legality of program options match the strong compliance monitoring focus of traditional state Chapter 1 administrations.

In school targeting and student selection, on the other hand, there were few differences between the traditional and changing Chapter 1 administrations, with most states continuing as they had under Title 1. The two clusters did not differ on targeting policies, documentation requirements, or restrictions on targeting options. For student selection, most states required information on selection measures used, including cutoff scores and the number of students to be served in each school. The state role in school and student targeting is mainly to convey to districts the allowable options and to review documentation that only eligible schools and students are served. The lack of change and the similarity in policies and requirements may reflect the common commitment across traditional and changing states to the primary intent of Chapter 1 -- to provide services only to eligible students and schools.

On evaluation, both traditional and changing administrations require or strongly recommend Model A, and all districts report data annually for TIERS. Changing states are more likely to have evaluation specialists on staff, are more committed to the use of sustained gains studies, and provide more technical assistance on evaluation than do traditional administrations, especially assistance for tying evaluation into program improvement. In traditional states, assistance is focused on complying with regulations. The emphasis on evaluation in changing states may be linked to the slightly greater propensity of these states to provide technical assistance on program improvement, but this conclusion should be viewed as tentative until further research explores the roles of evaluation in state administration.

The great diversity among states' policies on parent involvement -- ranging from requiring or strongly recommending Parent Advisory Councils or actively promoting parent involvement activities to simply requiring the mandated annual meeting of Chapter 1 parents -- is unrelated to whether state administrations are traditional or changing. The same three patterns were found in both clusters of states. SEA Chapter 1 program directives on parent involvement appear to stem from state philosophy about the value of parents in schooling.

This brief discussion of similarities and differences in administrative policies between traditional and changing Chapter 1 administrations shows both the usefulness of the clustering and its limits.

CHAPTER 5

AN ASSESSMENT OF CHAPTER 1 ADMINISTRATION AND ITS EFFECTS

INTRODUCTION

This study of Chapter 1 administration set out to look at how state administration has changed since Chapter 1 replaced Title I, and how these changes have affected the way that Chapter 1 programs operate. We found few significant changes that our respondents attributed to the changed federal legislation. In fact, in nearly all of the states we studied, we found few significant changes of any kind in administrative policies and practices. The organizational design of Chapter 1 offices had not been altered; monitoring procedures were virtually the same; and the revised accountability and reporting requirements had only modestly affected how staff used their time. In three of the nine states studied intensively, the role and responsibilities of the Chapter 1 office had been redefined; in two of those states, efforts to revise the state role had been encouraged by changes in the new Chapter 1 legislation. We called those three states the "changing" states. In the six states we called "traditional" states, we found very few changes in either state Chapter 1 policy or practice. Administration seemed to be remarkably stable in those states.

The apparent stability in administrative policies and practices does not mean that Chapter 1 offices operate just as they did under Title I. All of the state offices are staffed by fewer people now, reflecting reductions in the size of state set-asides and the effect of inflation on administrative budgets. The work of the professional staff still involves application review, monitoring, and providing districts with help. But the staff are now responsible for more districts and have smaller travel budgets and fewer resources to work with. Chapter 1 staff in most states report that they spend less time in their districts; they cannot provide the oversight and help that they could give districts when workloads were lighter.

The three changing states also have smaller staffs, but they have accommodated by altering some of the administrative practices that the traditional states are trying to maintain. One changing state has

reorganized: shortly before Chapter 1 was passed, it dispersed Title I administrative functions throughout the SEA, thereby effectively eliminating a self-contained Chapter 1 office of the sort found elsewhere. In the other two changing states, administrative practices are still in transition. One sharply curtailed its monitoring efforts for a few years and then resumed them under urging from the federal government. The other state also cut back on monitoring and has tried to assume a stronger role in program improvement activities, but has been hampered by a small administrative budget and a lukewarm reception from districts. It is too early to tell whether the changes under way in these states will be as far reaching as the SEAs would like them to be. Thus far, only one of these three states has changed the organization of its Chapter 1 office, but all have redistributed state-local administrative responsibilities by involving districts more directly in what used to be exclusively a state oversight role. In all states, then, administrative practices have changed since the days of Title I, whether as a result of deliberation and decision, or as a result of unsuccessful efforts to maintain the status quo in a changing fiscal environment.

In this chapter, we are concerned with how states carry out their administrative responsibilities. We are particularly interested in the states' monitoring and technical assistance activities and how effectively they are carried out with smaller state Chapter 1 administrative budgets. The first section of the chapter discusses how the states monitor local programs to learn about local compliance, and the effectiveness of state approaches. The second section focuses on the state role in local program development. It considers the different views held by state and local Chapter 1 personnel about the kinds of assistance that will improve programs and the difficulties states encounter in trying to provide assistance. These sections of the chapter are concerned primarily with practices in the traditional states, as most of the states studied fall into this group, including six of the intensive study states. Reports from the changing states indicated that SEA Chapter 1 administrative practices are still in flux. Hence, our observations about these states should be regarded as a starting point for further study rather than as conclusions about how and with what results these states monitor and provide assistance to districts.

The third section of this chapter explores the effects of administration on Chapter 1 program operations, as seen by these whose work and effectiveness may be influenced by administrative requirements. The effects of Title I/Chapter 1's administrative framework on the development of district capacity to strengthen local programs are discussed. So too are the contributions that administrative requirements and practices have made to local citizens' interest in and knowledge about public education.

THE EFFECTS OF ADMINISTRATION ON COMPLIANCE RELATED ACTIVITIES

For the past twenty years, state Chapter 1 administration has been concerned primarily with monitoring districts to ensure compliance. State Chapter 1 offices also make rules and interpret the federal law, review local applications, and prepare reports for various audiences. But when state and local staff are asked to talk about the role of the state Chapter 1 office, they almost always emphasize its monitoring and oversight responsibilities.

At the same time, the regulatory machinery of Title I/Chapter 1 has become increasingly familiar to district personnel, and acceptance of the law's intent has become widespread. Requirements such as comparability and targeting, once controversial, confusing, and difficult for local districts to carry out, are now more routine calculations. District superintendents who used to hatch grand schemes for Title I money are less naive about federal requirements, and realize the risks are too great to attempt anything clearly out of compliance. In fact, many superintendents -- nearly 30 percent in one state -- began their administrative careers as local Title I directors. Some requirements still nettle: many districts prefer to provide Chapter 1 services to all underachieving students regardless of attendance area poverty levels, and this has led to more inclusive school targeting policies. Nevertheless, the federal government's intention that Chapter 1 serve the lowest achieving students in the poorest schools generates little argument. After twenty years of experience with federal compensatory education, there is virtually universal local acceptance of Chapter 1's legal framework and its purposes.

State monitoring practices have begun to vary as local districts have become more accustomed to Chapter 1's requirements. Top level decisions in the SEAs of the changing states shifted resources away from monitoring and

turned more responsibility for compliance over to districts. Since Chapter 1 legislation did not exempt states from compliance responsibility, the reduction in state monitoring suggested that the changing states either trusted their districts, or trusted their own ability to learn about district compliance without extensive monitoring.

The traditional states, on the other hand, tried to maintain Title I monitoring practices even though their weakened administrative budgets suggested that this would be hard to do. Over time, their monitoring practices have nonetheless changed: the length and frequency of district visits have been reduced, and SEA Chapter 1 staff devote a larger fraction of time to on-site monitoring and less to providing assistance. SEA staff in these states assert that even with less coverage, they are no less informed about district compliance. They also believe that monitoring, even if less intensive, continues to be necessary to ensure compliance. Both groups of states, then, are confident that they know a good deal about local compliance, despite scaled back state monitoring efforts.

Of course it is possible that the states are being less than candid. After all, monitoring at reduced dosages can hardly be as revealing, or as effective, as when carried out at full strength. However, we propose a different interpretation. We suggest that both changing and traditional states do know a good deal, though not everything, about local compliance despite cutbacks in monitoring, but that they learn it by means other than just the formal monitoring review.

In the next few pages we will discuss how states learn about local compliance when monitoring has been reduced and the extent to which what they learn is reliable. We shall argue that the effectiveness of state monitoring activity comes less from the instrumental use of monitoring -- that is, detecting instances of noncompliance, although states do uncover violations; but rather more from the visible presence of state monitors in districts, to express the state's legal responsibilities and its determination to uphold them. Through this symbolic use of monitoring activities, states aid district Chapter 1 staff in their efforts to maintain the integrity of their programs and underscore for other district personnel that guidelines must be followed. In those instances where apparent noncompliance is undetected, it seems to result from breakdowns about what local monitoring is to include and from state monitoring that is too routinely done or too narrowly focused.

States monitor with different results depending on the thoroughness of the monitor, what is examined, and how carefully. By the same token, there is more to learn in some districts than in others. The difficulty for state monitors, particularly those in traditional states with heavy district loads, is to try to distinguish the districts that need careful monitoring from those that do not. While it would seem that all should be monitored equally, in fact some districts have always run "clean" programs and others are inclined to errors. Our assessment of monitoring practices in both traditional and changing states suggests that in fact many states do not monitor evenly across the board. Rather, they have introduced a process of selective monitoring whereby districts thought to be at risk are monitored thoroughly and frequently, while those that are at little or no risk are monitored less thoroughly, and in general less frequently.

The State Chapter 1 office distinguishes these districts on the basis of cues they provide -- cues that are derived from certain characteristics of districts, their staff, and their Chapter 1 programs. The at-risk districts include those with new superintendents and Chapter 1 directors, those that have had recent audit exceptions or findings, and those whose Chapter 1 staff ask the state to monitor. These high risk districts do not necessarily include those with the biggest Chapter 1 allocations, although most states do monitor their largest programs more frequently. Rather, they include those that pose a threat to audit-conscious states. In these districts, monitoring is carried out carefully and with attention to detail.

By contrast, districts that are at little or no risk of non-compliance are monitored less thoroughly and in general less frequently. These are the districts that have always run "clean" programs. Their cues are reassuring: they make few mistakes and are committed to serving the right students in ways that reflect the state's philosophy of service delivery. Their views and approaches match the preferences of the SEA, with whom they are on good terms. If something goes awry in these districts, the state usually hears about it from local Chapter 1 staff. These low risk districts are the vast majority, and from experience are not candidates for close scrutiny.

Selective monitoring -- concentrating on at risk districts with correspondingly less attention to low risk, "clean" programs -- is one

mechanism states use to minimize audit exceptions under reduced monitoring conditions.

Another device states use to ensure compliance is through support of the local network of Chapter 1 directors, most of whom can be counted on to find and correct violations in the schools or to point them out to state monitors. The collegiality of this network and its strong commitment to Chapter 1 intent make it a particularly valuable fraternity for state Chapter 1 staff in the traditional states, where efforts to maintain Title I monitoring schedules and procedures can easily result in thin coverage. In most states, monitoring is carried out internally by district staff whom states rely on to varying degrees to pre-monitor the district thoroughly before the state's visit. Scanty state coverage, then, does not mean that the state is uninformed about the program's status. It suggests rather that a good deal of state monitoring is more like an audit or a check on local monitoring than a comprehensive program review in its own right.

The extent to which the states depend on districts to do the monitoring for them becomes more apparent when we look at a typical state monitoring visit. The monitoring process is carried out differently by different state Chapter 1 personnel, as we noted. But it appears that many districts are monitored by the state in a routine and fairly perfunctory manner. Districts are visited and their records are reviewed, but the visits are brief and the reviews superficial. A number of the SEA Chapter 1 staff said that they seldom spent more than a half hour to an hour in a Chapter 1 school, including its classrooms. Visits to three or four schools per day, in addition to several hours in the district office, were the rule. In the largest districts with many Chapter 1 schools, the state's visiting schedule permitted annual visits to district offices but less often to schools. More frequently schools were visited every several years -- at the extreme, once every eight years. Most state staff felt they could still adequately monitor a district in the allotted time. Some said that while monitoring, they got a "feel" for whether or not their districts were operating legal programs. Others were less optimistic. One Chapter 1 director, committed to annual monitoring visits to every district, said the state was "living on our past reputation" for thoroughness and could not maintain the monitoring standards of several years earlier. Overall, however, many remarked on the

effectiveness of self-monitoring by districts and even more were confident that they knew when districts were and were not in compliance.

That, of course, is the central question. Does state monitoring as it is carried out produce valid, reliable information about local program compliance? Our evidence suggests that the state's information depends in part on how comprehensive and careful its own monitoring is and in part on that of local staff. State staff find infractions when reviews are carefully carried out. But some violations appear to pass unnoticed. Exploring these in more detail highlights limits on the ability of on site state monitoring to uncover compliance violations.

Our field staff found several instances of apparent noncompliance in districts visited. Most took place at the school level, where principals occasionally asked Chapter 1 teachers to substitute in regular classes or when Chapter 1 aides worked on an ad-hoc basis with non-Chapter 1 students. None of these were gross infractions in terms of the number of people or dollars involved.

Two other examples from the field staff appear to be more serious, and deal with charged time of non-instructional personnel. In one metropolitan district where well over half the students receive free lunch, the SEA monitor spends about half her time in schools. Both her SEA colleagues and the district consider her thorough and precise, with strong attention to detail. Yet our study staff discovered that over 40 teachers based in Chapter 1 schools are funded by Chapter 1, although they spend but one third of their time in direct instruction with Chapter 1 students. The rest of their time is spent on curricula and staff development for all teachers in the Chapter 1 schools. They are the district's only means of spreading its new teaching concept, which, we were told, was a factor in the district's expanding its Chapter 1 services this year to as many schools as possible. Slightly more than 90 percent of its elementary schools are now served.

One could argue that this is not a violation of Chapter 1 law, that as long as technical assistance is reserved for Chapter 1 schools and could arguably apply to low achieving students, then all teachers in those schools are eligible to receive it. One could also argue that even if this practice is technically legal, it may violate the spirit of the law. By expanding Chapter 1 services to more schools in order to disseminate its teaching

concept as widely as possible, the district has ensured the Chapter 1 students receive less concentrated services than they did before. One can convincingly argue that it is pedagogically more sound to focus on an entire school with a large percentage of high need students than to target exclusively on the low achieving students. In this instance, however, the district appeared more intent on spreading its new teaching concept districtwide than in concentrating on the smaller number of schools they had previously served.

The other example reported by the field staff involves a medium-sized high poverty district that the SEA monitor visits every six weeks, spending virtually all of that time in schools. He reviews documents, interviews staff, reads teacher logs and students' individual education plans, and observes classrooms. He spends little time in the district office or on district Chapter 1 issues. Yet the field staff found that Chapter 1 funds were used for the salaries of administrators who spend little time on Chapter 1. Sixty percent of the salaries of two vice principals, who are known as helping teachers, were funded by Chapter 1, yet the vice principals agreed that they did not spend 60 percent of their time on Chapter 1. Similarly, the district coordinator has 30 percent of her time covered under Chapter 1 but spends much less than that on the program. This was not a difficult infraction to detect; the ratio of administrators to students was much higher in this district than in any other medium-sized district in our sample. Comparing it with other medium-sized districts in the state (or in the monitor's caseload) would have identified this district as administratively top heavy for its size, and therefore a candidate for further state review.

Why do isolations of this latter sort, which differ in magnitude from the Chapter 1 teacher occasionally substituting for the regular teacher, pass unnoticed by state Chapter 1 personnel? Part of it may come from uncertainty about how many non-instructional personnel are needed to run a quality Chapter 1 programs. There are no good "rules of thumb" to apply since one could anticipate differences, especially if districts were initiating major instructional change in Chapter 1. No such initiatives, however, were underway that could account for the top heavy administration in this district.

What appears to have occurred is a breakdown in the communication network between state and local Chapter 1 staff, including understandings about what the district Chapter 1 coordinator is to pre-monitor and report.

When such breakdowns occur, the limitations of state monitoring become quickly apparent. One limit we have already mentioned is that state monitoring is often too perfunctory and superficial to assess program compliance adequately. Another is that monitoring seems to have become too routine among some Chapter 1 personnel. They have been following the same procedures, often in the same districts, for many years, and in most of those districts, local pre-monitoring catches errors and the state staff seldom find anything of any consequence out of order. It is not surprising that regular monitoring under conditions of high local compliance eventually drains the process of its meaning, leaving monitors to go through the motions without expecting, or even looking for, signs that the program has slipped off track.

In addition, the check lists developed by states to standardize monitoring and to guide districts in their pre-monitoring may have become a minimum standard that is frequently not exceeded by state personnel. That is, the check lists indicate to both state and local personnel what documents and program elements are most likely to be reviewed, although of course state staff are free to review anything. Combined with routinized monitoring and a heavy schedule, the check list permits state staff to overlook other parts of the program. The check list also indicates, by omission, what aspects of the program are not on the agenda, and so in effect invites districts to pre-monitor only what is on the list, and to assume that other parts of the program will likely not be addressed. We do not know how many state personnel monitor beyond what is included on the check list, but some said that they did not. In one instance, a state staffer said that he was reprimanded by his boss for criticizing local practices that did not appear on the check list.

Lastly, some SEA monitors appear to spend considerable effort on peripheral paper compliance activities, such as reviewing teachers' logs and every Chapter 1 student's file for individual educational plans. Such time could be redirected.

The picture that emerges is one where without local monitoring and a willingness to correct errors or report them to state Chapter 1 staff for action, state monitoring falls short of its intended purpose: to watch over local operations and, in effect, certify their legality to the public and to the federal government. This is most evident in areas where compliance is difficult to define or measure -- such as the appropriate mix of non-

instructional Chapter 1 staff. Violations here are more likely to go unnoticed if state monitoring is carried out too routinely or is too narrowly focused on check-list items.

It is not surprising that the effectiveness of state monitoring is highly dependent upon collaborative state-local monitoring agreements. Both state and district behavior is influenced by their traditional working relationships. In the vast majority of districts, local acceptance of the state monitoring role and local willingness to comply with the law characterize the working relationship. The state Chapter 1 office, like other bureaus of these SEAs, works most effectively with districts by drawing on the strength of these established relationships, rather than by its ability to offer needed technical skills or to apply pressure. Because state Chapter 1 offices take seriously their legal responsibility to ensure districts run compliant programs that can pass muster with auditers, states do call districts to task and threaten to rescind part of their Chapter 1 allocations for flagrant violations. For marginal noncompliance and in dealings with the few at-risk districts where working relationships have historically been troublesome and strained, this ultimate sanction is used sparingly. It is expensive and time-consuming; but more important, it unsettles things, and stimulates conflict in an organization that prefers the appearance of equilibrium. State Chapter 1 efforts then are restrained and gradual even though Chapter 1 monitors might prefer to take more concerted action. In one state visited, where districts appeared to have considerable autonomy, the SEA Chapter 1 program ensured eligible schools and students were selected (and in fact had one of the lowest cut-off scores in our sample), but took a muted approach to districts regarding questionable matters in other areas.

> The sine qua non around here is to avoid making mistakes so that the issue goes to the [state] superintendent. When I find a district out of compliance, I write a letter that gives them a few weeks to correct the problem. If they don't, there's nothing I can do but write another. I visit again the next year, and if it still isn't fixed, I'll go back the next. But there is nothing else I can do that might not create a problem upstairs.

Thus except for the more obvious noncompliance, weak SEA political and legal authority can restrain vigorous monitoring by states that lack the full cooperation of their districts.

Audits are intended to detect noncompliance and thus reinforce the role of state monitoring, but their utility appears confined to fiscal matters and program areas that are easy to check (e.g., selecting schools according to certain criteria, having documentation of an annual parent meeting). While audits seem to serve a useful function in this area, they seem ill-equipped to deal with the more complex compliance issues. We did not, for example, find instances where audits checked how teachers and aides use their time, or ensured that the time allocations of administrators accurately reflect what they do. We do not recommend a more expansive role for audits, but rather want to note the limits of audits to reinforce the state monitoring role.

While recognizing the limited scope of audits, we found few examples where states were coordinating the auditing process and its findings with SEA monitoring activities. One state scheduled its on site monitoring to coincide with the off-year of the biennial audit. During the off year, the audit reports were reported to serve a quasi-monitoring function. All audit reports were completed in January with a copy sent to the appropriate SEA monitor. During the spring the monitor and district would then handle whatever audit questions arose. We saw little evidence of such systematic SEA use of the auditing process in other states visited, although SEA monitors in all states appeared especially attentive to any recurring audit difficulties in districts.

While district Chapter 1 directors were committed to running legal programs and took compliance issues seriously, field staff were impressed by the lack of "audit anxiety" in districts and the peripheral role of audits in district concerns. Local Chapter 1 staff were often vague on what an audit involved. In one of the largest districts, the chief of the finance division, who had previously covered Chapter 1, could not recall that the program had been audited in several years. On questioning, his staff assistant remembered an audit of Chapter 1 travel vouchers two years earlier. While he may have confused federal with state audits that are conducted more frequently, his reaction supports the view that audits seem peripheral to district pre-monitoring activites. This is not to suggest that audits are not being done

or should not be done; but it does suggest that audits provide limited support to Chapter 1 monitoring efforts.

Thus, the effects of monitoring on the availability of information about local program compliance are mixed. States have identified the few at-risk districts where noncompliance is more likely and focus more attention there than on districts running "clean" programs. States also find infractions when reviews are carefully and conscientiously carried out. To discourage long-term staff work with the same districts and to help state staff remain attentive, a few state Chapter 1 directors are rotating monitoring staff assignments every few years. They say this helps. Others are beginning to use teams of state and district personnel for site visits rather than relying solely on the generalist monitor, which may help as well.

The foregoing discussion of state monitoring raises questions about its purposes. If state monitoring resources are spread too thin, the scope of monitoring is too narrow, and the process is carried out in too routine a manner, what role does state monitoring play other than to endorse district reports of self-monitoring? If state Chapter 1 offices are so dependent on local Chapter 1 staff for information about compliance, why not bypass the state altogether and shift formal responsibility for all monitoring and compliance to the districts themselves -- a shift that has occurred to some extent in the changing states?

The conclusion that state monitoring does not have a strong fault-finding role ignores the most important role that monitoring serves -- a role that goes beyond its verification and certification purposes. State monitoring in good measure serves a symbolic function. The symbolic role of monitoring is both useful to districts and crucial for some to maintain the integrity of their programs. As one local Chapter 1 director said:

> In large districts, you can easily get into a situation that violates supplement not supplant. School administrators have lots of grand ideas and no money. But Chapter 1 does [have money], and they'll try hard to get it if you are not careful.

The periodic presence of state monitors in the districts serves as visible evidence and a reminder to school staff and district administrators that

Chapter 1 is not a general aid or block grant program. Its services are intended for certain students and its funds can be used only for certain purposes.

Considered from this perspective, the purpose of SEA school and district visits becomes less one of uncovering compliance violations or certifying local compliance reports. It is more one of expressing through its review of particular program features the state's legal responsibilities and its determination to uphold them. State monitors convey this message by the fact that they always schedule conversations with school principals and district superintendents; these meetings are a particularly important aspect of these formal monitoring visits. Moreover, the visits are followed by letters from the state Chapter 1 office to district administrators, indicating program areas that were reviewed and what was found. The visits and letters help to underscore that the program's federal and state guidelines must be followed. In this view, on-site monitoring is more an exhibit of state authority and intent than a time for substantive work.

Another important purpose of state monitoring is that it encourages local Chapter 1 staff to maintain the integrity of their programs when they are threatened -- which by all accounts, is not a rare occurrence. In many districts where the responsibility for Chapter 1 does not lie with top-level administrators, but has been delegated to positions that lack authority or political support, Chapter 1 staff may be hard pressed to deal with program infractions found in schools. It was not uncommon, for example, for local Chapter 1 directors to tell SEA monitors what schools to visit and what issues to raise with principals. As one local coordinator said, regarding a principal who continued to use a Chapter 1 aide for library duty:

> There are just so many times I can complain to the associate superintendent [about it]. In doing her regular visit, [the SEA monitor] also looks for what I suggest and writes about it, so it is the state that requires the change, not me.

SEA monitoring activities thus serve important purposes beyond uncovering noncompliance. The symbolic role of federal and state government in persuading municipalities, where authority for education is vested, to conform to external preferences and requirements is tried and effective.

THE EFFECTS OF ADMINISTRATION ON PROGRAM DEVELOPMENT

One of the rationales cited in the ECIA preamble for reducing prescriptiveness and eliminating paperwork in the Chapter 1 legislation was that it would enable states and districts to redirect resources to program improvement. While this was not expressly stated in the law, many hoped that states would resume the efforts to work with districts on program improvement that some states had started during the two years in which the administrative set-aside had been increased.

The issue of state assistance to districts for program improvement is complicated by several factors: differences in state and local definitions of assistance for program improvement; the lack of a clear state mandate to help districts with curricular and instructional issues; the absence of federal requirements for a state role in program improvement; the development of a state capacity to provide high-quality assistance; and the reluctance of the traditional states to revise the compliance monitoring function. This section of the chapter discusses these issues and their effect on the states' program improvement efforts.

The kind of assistance that states believe will lead to local program improvement differs from conventional ideas about how program improvement comes about. State Chapter 1 personnel believe that the first step in developing a high-quality program is ensuring that it is legal. Hence, the emphasis stays on compliance and providing assistance to ensure it. More conventional definitions of program quality in education relate to the quality and appropriateness of curricular materials and to instructional methods. In these terms, technical assistance is usually aimed at locating or developing better curricula and at improving the quality of instruction.

In conversations with SEA Chapter 1 staff in traditional states about the technical assistance they provide to improve programs, most spoke of their efforts to clarify the law and to help districts modify program designs, materials, and documentation to achieve compliance. Rarely did they mention technical assistance in terms of curricular or instructional areas. Some staff -- particularly newer members with backgrounds in curriculum and instruction -- offered program improvement suggestions to teachers, and ran ad hoc technical assistance sessions during monitoring visits. But instances of

this kind of substantive help were rare in traditional states. Annual statewide Chapter 1 meetings usually include sessions devoted to instructional issues and techniques that work with youngsters. But insofar as technical assistance for program improvement is thought to require qualified assisters and sustained work, traditional state Chapter 1 offices provide virtually no program related technical assistance.

The changing states appear to devote considerably more attention to and assistance with local program development, or to studies of different program designs with the hope that districts will use the results to improve their programs themselves. The deregulating state ran Chapter 1 sponsored evaluation workshops for districts to improve their capacity to conduct analyses on their own, and to implement more effective programs. In the coordinated state, program improvement requirements had been issued as a state mandate, and all schools had to strengthen all aspects of their curriculum, including Chapter 1 programs. The state was not providing assistance directly, but instead had developed materials on exemplary projects and was offering incentives to encourage districts in program development. In the quality oriented state, the Secretary's Initiative provided the means for identifying and disseminating exemplary Chapter 1 programs, and the state had worked with others in the region to develop program information and materials for district use. In addition, all of the changing states retained a full-time evaluation staff member on the SEA Chapter 1 budget -- a position that had been eliminated or reduced to less than half time in all but one traditional state.

We know little about the effectiveness of these program improvement efforts, as they are relatively new program initiatives. We do know, however, that in one of these states, the state's effort to provide help is not matched, in the three districts visited, by interest in receiving it. A staff member in one of the largest districts said that local Chapter 1 staff were generally better informed about materials and instruction and had more direct experience with Chapter 1 programs than did state personnel. District staff were thus better qualified to provide assistance needed. He said that the district Chapter 1 office did not want state help, and thought that others on the staff shared his feelings. Judging from our research in the other two districts in the state as well, the effect of state efforts thus far appear to

be modest. Yet we were told that other districts in the state were more receptive, and that those visited were exceptional. That may be true: the Chapter 1 district staff were unusually well qualified for districts as small and remote as the two smaller ones we visited, so that the reports may well be an artifact of our sample.

Still, especially in traditional states, state Chapter 1 offices are not regarded as rich resources for program assistance. Districts no longer need assistance in the area where states are most knowledgeable and experienced -- compliance. For states to shift focus to build up staff expertise in program assistance, however, runs counter to the historical hands-off policy of states in local educational matters. The changing states may find that their efforts to provide help in curricular and instructional areas are also slow to win local acceptance. An extended process of careful persuasion may be required before states develop a local market for these services.

The infrequency of state curricular and instructional assistance does not reflect local needs. Although almost all of the largest districts said that the quality of their own in-service capacity eliminates the need for state assistance, smaller districts, particularly those without well trained or certified content instructors, often said that they want and need help. Some call on regional TACs; some wish that their SEA Chapter 1 consultants, who know the program, the children it serves, and the district's context, could be more helpful. The absence of technical assistance for program improvement from the SEA Chapter 1 office appears to result from the lack of time, or of staff qualified to provide it. State Chapter 1 offices also do not have a mandate from the federal government, the SEA, or districts to provide technical assistance in curricular and instructional areas.

The absence of well specified federal requirements for a state role in the development of strong local Chapter 1 programs has further impeded state efforts in this area. One SEA Chapter 1 director who wanted to be more active in program improvement was frustrated by the absence of a federal mandate. He said, "There is nothing in the federal law or regs that requires me to provide that kind of help." Particularly in the absence of federal clarification of Chapter 1 requirements, traditional states are reluctant to shift resources from compliance related activities to help districts with

program improvement. When the administrative set-aside was increased by 50 percent to encourage states to develop more systematic monitoring and enforcement efforts, curriculum specialists were also hired and SEAs began to pay more attention to local program content. But when the set-aside was again reduced, the states' agenda of compliance activities -- especially monitoring, application review, and review of various other local reports -- crowded out continued development or exercise of their program improvement capacity.

At present, most state Chapter 1 offices have little capacity to provide program assistance. We found only one or two staff members per state with instructional or content expertise; these were usually women hired within the last few years. They provided more instructional and materials assistance than did more senior staff, but they helped only in the districts they covered and their expertise was rarely tapped by their Chapter 1 colleagues or made available to districts statewide. With a full complement of districts to monitor, their program improvement activities were an add-on. The hiring of staff with this expertise did not appear to signal a new SEA commitment to working with districts, although it did indicate that the Chapter 1 directors' were sensitive to program improvement issues.

Most other Chapter 1 professional staff had come to the SEA from local or state administrative positions, were older, and had many more years in the programs. As one SEA Chapter 1 director observed, "[When we hired staff years ago,] we looked for backgrounds in administration, people who could lay down the law with principals and superintendents." There are signs that this is changing even in the traditional states, and there is a tendency for new Chapter 1 directors to take a greater interest in educational improvement. The process however is slow, occurring with retirements and resignations rather than through replacements designed to build a program improvement capability in the SEA.

Some SEA consultants and district Chapter 1 personnel suggested that the districts themselves are reluctant to assign a new assistance role to state Chapter 1 offices, even when many of them clearly could use some help. For most states in our sample, instruction and the content of the curriculum are seen as local, not state, responsibilities. The authority of the states is limited in those areas, and they have little if any history of participating in decisions about what schools teach. The states' lack of

interest in becoming involved in local programs is matched by the districts' disinclination to encourage states to broaden their participation in local matters. Thus, even when state staff are qualified and the district needs assistance, local staff express some uneasiness about inviting states to provide technical assistance directly.

Local staff also doubt that state staff are qualified to be involved in program areas or interested in doing so. In several districts, Chapter 1 directors said that they respected their state consultants' knowledge of legal requirements, but that the consultants would not be the people they would turn to for substantive advice about programs because they were not qualified. A large district's director underscored the point by adding that from time to time the state office asks her staff for information on new curricula and teaching strategies. She observed that SEA Chapter 1 staff are not necessarily uninterested in program content, but that the state won't authorize them to attend professional meetings that would keep them informed about new developments in the area of reading. Thus the legal and traditional restrictions on the states' involvement in local education programs, the federal silence on a state role in program improvement, and the twenty-year history of virtually exclusive state attention to program compliance have combined to prevent states from playing a major role in strengthening local Chapter 1 programs.

The relaxation of federal requirements and the possibilities it introduced for redistributing Chapter 1's administrative resources may gradually lead SEA Chapter 1 offices to develop a greater capacity in program improvement. And movement in that direction may be spurred by the many new state education reform agendas that greatly expand SEA involvement in teaching and curriculum content. With increased attention from legislators and governor's offices and with more state funds invested in school improvement efforts, SEAs are more likely to capitalize on the program quality expertise of current staff. In addition, as more senior staff with administrative credentials retire and states replace them with content specialists -- an emerging pattern in some states -- this new staff cadre may draw attention to the possibilities for helping resource-poor districts. New staff's instructional expertise may convince districts that the SEA can play a serious role in these areas.

But this will not be an easy task. SEAs in general have poor reputations as sources of local assistance, and they are not known for putting resources into program improvement. Even in the current education reform climate, most states have been far more willing to propose new initiatives for local action than to underwrite the costs of their implementation. History and expectations will need to be overcome. Increased state involvement in Chapter 1 program improvement also is unlikely without additional money, or a reallocation of existing funds such that an increased share of the state set-aside is earmarked for improvement activities. A redefinition of SEA responsibilities by the federal government may be necessary, as well as time for districts to adapt to a new state posture on assistance. Without the provision of incentives that will encourage a new state role and help to alter local attitudes about that role, it seems doubtful that SEA Chapter 1 offices can contribute successfully to improving the quality of curriculum and instruction in local programs.

THE EFFECTS OF ADMINISTRATION ON CHAPTER 1 PROGRAM OPERATIONS

Chapter 1 legislative requirements, along with state policies and practices for carrying them out, ultimately are intended to ensure that supplementary educational services are delivered to the appropriate students. Over the past twenty years, the contributions of this administrative apparatus to service delivery have been debated frequently. Have the Title I/Chapter 1 administrative requirements contributed to program quality? Have they ensured that funds are spent appropriately? AAI was asked to consider these issues, and did so in conversations with those concerned. Rather than attempt to form independent assessments of these issues, we were interested to learn how those who participate in Chapter 1 programs, and whose work and effectiveness may be influenced by administrative requirements, view the role they play and the program they influence. In addition to district Chapter 1 coordinators and staff, interviews were held with principals, regular teachers and Chapter 1 teachers in 80 schools across the 27 districts visited. Conversations were also held with parent representatives in these districts.

Proper Use of Federal Funds

Conversations with Chapter 1 personnel, Chapter 1 parents, and school principals strongly suggest that Chapter 1 requirements are effective in targeting schools and students who need compensatory educational services. Districts appeared very careful to ensure only eligible students were enrolled, and monitors thoroughly scrutinize documents on school targeting and student selection.

But the generous eligibility criteria for targeting schools, coupled with strong local pressure for wide coverage, have led to the spread of program services across many schools in some districts. As one Chapter 1 parent comments, "We're mostly wasting our money. It gets piddled away in practically every school in the district. What we really should do is focus our resources so that we really can have an impact." While the eligibility requirements for school targeting ensured that only low-income schools are included in the targeted group, Chapter 1 services in the districts visited were spread over two-thirds of the schools in grade spans served. Although the proportion of schools served has not increased appreciably since Chapter 1, a few high poverty districts took advantage of the relaxed 25 percent rule.* While we cannot comment on the quality of current Chapter 1 programs, it is reasonable to assume that some high quality program designs were not possible in some districts because they would require substantially greater concentrations of resources in fewer schools.

Chapter 1's comparability requirements, while sound and essential, may lead districts to change targeting procedures to serve more schools; hence services are diluted. Of the eight metropolitan districts in our study, one has had a chronic problem with ensuring that Chapter 1 and non-Chapter 1 schools are comparable. Its most recent solution was to change targeting procedures to serve more schools, even though services were spread more thinly. As the chief financial officer said,

*Under Title I, the 25 percent rule could be applied only if the total level of Title I and state compensatory education expenditures in Title I areas served the previous year remained the same or increased. This condition no longer applies under Chapter 1.

> This year we shifted from serving two-thirds of the schools to serving all but a handful by changing from the averaging method of targeting to the 25 percent rule. About 30 schools were added. This reduced our potential comparability liability by about $4 million. It helps us, but it's not clear that it helps the children. More schools and more children are served, including some in schools not targeted before who were further behind than children formerly served. But the services are spread more thinly.

The changes in service mean that students get less time from aides; more students who should receive services in both math and reading are getting single services; and more students are served after school than during the school day, which increases the difficulty of coordinating their regular and Chapter 1 programs.

Program Quality

Administrative policies were cited as having had differential effects on program quality. Several district Chapter 1 coordinators and principals in Chapter 1 schools view the size, scope, and quality criteria, broad as they are, as partially responsible for the presence of highly competent teachers in Chapter 1, and in some instances for the use of innovative instructional methods. In conjunction with more stringent state standards on reading certification, which some believe were spurred by Title I's concern with achievement, these requirements are credited with the formation of a cadre of instructional leaders, especially in elementary level reading, among Chapter 1 teachers,

In one state, for example, principals and regular classroom teachers viewed Chapter 1 teachers as key reading resources in their schools, and consulted them about teaching methods, curriculum materials, and approaches recommended for particular children. An implicit part of the Chapter 1 teacher's job in one district was to make their expertise available to the rest of the faculty. As one elementary principal reported, "I lean on [the Chapter 1 teacher] for the total school program. When we were converting to the McMillan series last year, Mrs. B. was one of the key decision makers and has been a great help in implementing it." Chapter 1 teachers often have advanced training, particularly in reading, and thus are well qualified to play this role in their schools.

If size, scope, and quality requirements have tended to push states and districts to create their own small-scale, intense programs, the student targeting requirements have focused instruction on the lowest achieving students. According to one state Chapter 1 director, "Chapter 1 teachers are perceived as the group that can teach those 'hard-to-teach' kids."

Some local circumstances can militate against the use of this expertise. In one state, all Chapter 1 reading teachers must be reading certified. If the district does not call them "teachers," it need not pay teachers' wages. Several districts in this state call the reading certified Chapter 1 teachers "tutors," and pay them hourly at an annual rate of less than $10,000 -- even though the state-set minimum starting wage for teachers is $18,000. About one-fourth of the Chapter 1 teachers turn over each year as classroom teaching jobs become available.

In most states, however, the existence of Chapter 1, with its small classes and relatively advantageous working conditions, has contributed to teachers' satisfaction and positive attitudes toward their work. In one state, Chapter 1 teachers were asked whether they would return to regular classes if invited. All of them preferred to remain in Chapter 1, despite the varying degrees of job stability that accompanied the position. Many said that they like the small size of Chapter 1 classes; a few said they valued the opportunity to work with students individually. "You can see more progress for Chapter 1 kids than you can for regular classroom kids, and it is very rewarding," one teacher commented. Chapter 1 freed another teacher from the constraints of using the districtwide curriculum, letting her give free rein to her creativity, knowledge of materials, and teaching skill.

Moreover, Chapter 1 teachers are partially protected from the supervisory and non-teaching responsibilities that so many classroom teachers complain of. District Chapter 1 administrators indicated that one of the exciting things about Chapter 1 is that all the good teachers now want to be a part of it. They say that many teachers have returned to school to obtain special reading certification to improve their prospects for moving into Chapter 1. The view has developed among teachers that Chapter 1 is a good place to work, and Chapter 1 administrators believe that this has significantly improved the quality of its teaching staff. The special conditions of work and the frequently elevated status that accompany

participation in Chapter 1 have contributed to a level of teacher satisfaction that in recent times is unusual.

Our study failed to substantiate the argument that Chapter 1 administrative requirements themselves hinder the development of high quality programs. If anything, program quality is more apt to be compromised by staff competence, local politics, and unwise resource allocation decisions. District Chapter 1 coordinators appear to respond to the requirements in ways that are consistent with their own professional styles and their goals for the Chapter 1 program. Some directors like administrative work and tend to spend more time at it. Others keep it tightly controlled and at a minimum. As we noted earlier, few states and districts devote much time to improvements in program quality. When they do, administrative requirements pose few problems.

One mid-sized district provides a good example. The Chapter 1 director also served as district reading and language arts coordinator, and at the time of our visit was designing a new reading program. Chapter 1 administration occupied about 15 percent of her time; it included managing the flow of paper to the state (i.e., the annual application, comparability and evaluation reports, and budget amendments) and supervising the work of teachers and aides. She managed these tasks in two ways. First, the administrative procedures were highly routine. A secretary did a great deal of the work. The director did some of the poverty and eligibility calculations, but this took only a few days a year. Second, she used some of the Chapter 1 requirements for multiple purposes. For example, the required narrative on the annual application helped her to revise and refine her program philosophy; and she used it with Chapter 1 teacher in-service, so that it became a vehicle for communicating to staff her vision of the program.

Evaluation

District Chapter 1 coordinators cited Title I evaluation requirements as enabling them to develop staff expertise and compile technical data that could be used in decision making. Along with technical assistance from the TACs, these requirements were also cited as helpful in improving district testing procedures. The actual use of evaluation information in program decisionmaking depended not on federal legislative language promoting its use, but rather on local conditions, such as district size, staff

expertise and commitment, and sufficient concentration of funds to conduct well-designed studies. All but one of the metropolitan districts in our study used, or tried to use, evaluation results for a program status report (answering "How well is the program doing?"), for student diagnosis and prescription, or for program improvement (e.g. choosing among program designs on the basis of their effectiveness). An additional use for evaluation, mentioned in large districts only, was protective: positive gains prevented district officials from interfering with the program. Districts continue using the RMC models and TIERS, although they are no longer required. How long they will continue these activities without an explicit federal mandate is unclear.

Parent Participation

Parent involvement requirements have not encouraged the development of political advocacy or a parent accountability role for Chapter 1, as had been intended in the original Title I legislation. But whether parent involvement has decreased markedly since Chapter 1 replaced Title I is a matter of dispute.

Most of the Chapter 1 staff we spoke with said that parent involvement has decreased, despite many districts' requirements that schools campaign heavily to draw all parents to school. Some staff disagreed, however. They defined parent involvement to include working with children at home, in which case they say parent involvement has increased. Everyone does agree that school site councils have all but disappeared everywhere but in the largest cities. So by the old definition of bringing Chapter 1 parents together in school on a regular basis, parent involvement clearly has declined.

Chapter 1 staff are virtually unanimous in supporting the elimination of some of Title I's parent involvement requirements (especially elections to councils and school PACs), not because they think parent involvement is unimportant, but because too much time was spent to little avail in trying to involve parents somewhat mechanistically in the program. Although districts were able to satisfy the requirements, the intent to involve parents in an oversight and decisionmaking role was seldom realized. Since Chapter 1 went into effect, parent involvement has been redesigned in

most districts, with PACs continuing primarily in the large districts. In those districts with staff commitment and community and parent involvement in schools, some staff and parent coordinators felt that Chapter 1 requirements had decreased the legitimacy of parental involvement; they wanted strong language in the next authorization.*

Rather than political advocacy and oversight, perhaps a more important contribution of Title I parent involvement was the opportunity it offered many parents. Parent councils helped to develop parents' confidence, leadership skills, and commitment to public education. They also encouraged many parents to complete their own formal educations. In half of the states studied, Chapter 1 staff provided examples of parents who had moved from silent attendance at Chapter 1 parent meetings to visible roles or teaching positions in district schools, as illustrated below.

> Mike C. began involvement in Chapter 1 when the first of his five children was assisted by the program. At first he was extremely quiet, but used workshops and PAC training opportunities to develop skills and confidence. He is now the regional chairman of the National Coalition of Chapter 1 Parents and plans to run for the city Board of Education.
>
> Ramona T. spent five years involved with a Chapter 1 PAC. The district office recommended her for a job in city government. She has gone from an entry-level position to a managerial post, and describes her training in Chapter 1 as the impetus that started her on this career path.
>
> Sara S. moved on to participate in the state PAC after participation in her district PAC. She then finished high school and college, and became the parent coordinator in her home town and then a teacher. The state Chapter 1 program hired her as a regional supervisor, which she remained for 18 months before being let go when the state set-aside was reduced.

A number of districts reported that such "success stories" have been occurring much less frequently under Chapter 1. The needed support services are no longer available to parents, and the structure of parent involvement in most

---

*The new parent involvement regulations were released after our field visits.

districts is aimed at developing parenting skills rather than leadership and personal skills.

Program Coordination

Although claims of fragmented services seem always to plague supplemental programs, a consistent finding of our school-based research was the strength of the opinion that Chapter 1 is part of an integrated continuum of services for low achieving students. Coordination of Chapter 1 with other school offerings -- whether the regular curriculum or other special programs -- was not mentioned as a problem by principals, or regular or Chapter 1 teachers, who saw the services as integrated with each other. District and state staff, on the other hand, tended to have more questions about the extent to which program integration actually took place.

What appeared central to the integration of Chapter 1 pullout classes with regular instruction was the informal interaction between the Chapter 1 teacher and the classroom teacher. In one state, some Chapter 1 teachers routinely checked with classroom teachers each morning to find out what the class would read that day. Others chatted briefly when picking up or dropping off students or during breaks. Both classroom and Chapter 1 teachers mentioned frequent swapping of notes on techniques that worked well in motivating students. Formal interaction, on the other hand, teachers said was not useful. Chapter 1 teachers did not think the periodic written progress reports they prepared on individual students contributed to coordination, but saw them as a ritualistic exercise.

Communication about low achieving students reportedly occurred regularly between Chapter 1 and special education services, especially in medium and smaller districts. In one district, the Chapter 1 director was also the director of special education staff. In another, the two directors had collaborated for years on programs and services. Many schools visited had "building based referral teams," which screen all children referred for any special services and which include both Chapter 1 and special education teachers. Many interviewees, both teachers and administrators, said that this constituted "a continuum of services," although the integration of these services may work more effectively at the building level and in smaller

districts than at the district level in large districts where programs often are housed in separate divisions.

CONCLUSION

Our conversations with Chapter 1 staff, parents, and school principals indicated that Chapter 1 administrative policies and related practices have largely, but not entirely, had their intended effect on program operations. As we have seen, the policies and practices and the ways in which they are carried out are not problem free. But if effectiveness is measured in terms of the extent of local compliance with the law, then the results of this national study indicate that Chapter 1 administration is remarkably effective.

One reason why the policies and practices in general have worked so well is that the nation's districts and schools are strongly inclined to comply with them. The vast majority of school people agree with its intent to serve underachieving youngsters. Even when particular policies and procedures are thought a nuisance, the vast majority believe that compliance is still a small price to pay for the benefits that children, teachers, schools and districts derive from the program.

Policies and practices have also worked well because Chapter 1 has had a twenty year history of strong monitoring and enforcement and increasingly strong public support. For most of this time, states have been successful in convincing most localities that it was not worth the risk -- whether in terms of paybacks or bad publicity -- to spend Title I/Chapter 1 funds for illegal purposes. At the time, education research indicated that Title I benefited poor and underachieving students in diverse ways, and public opinion grew more sympathetic to the educational needs of these students. Chapter 1 has worked well in good measure because it has drawn on the legacy of compliance and commitment to compensatory education that was nurtured during the 16 year tenure of Title I.

We have no reason to believe that local commitment has lessened or that compliance is weaker than it once was. Indeed, our evidence suggests the opposite to be the case. But this chapter has made a particular point to discuss the states' administration of compliance related responsibilities in order to underscore the way those responsibilities are carried out. The point

that we wish to convey is that state compliance related practices taken alone do not have their primary utility as a fault-finding mechanism. This is not to suggest that there is an increased state need for the detection of violations, but to say that the system works in a different way. State monitoring activities are effective primarily because they visibly demonstrate state commitment to the program and support local Chapter 1 staff to maintain compliant programs.

The Title I/Chapter 1 state-local network that developed over a 20 year period has made compliance a collaborative task. Both states and localities have a commitment to the program and a vested interest in ensuring that it was compliant. Once this responsibility was shared and headline audits became a thing of the past, the state's monitoring role diminished in its importance as a procedure for detecting violations. The importance of the states' symbolic role to remind localities that Chapter 1 is a targeted, supplemental program has correspondingly increased, as has its importance to local Chapter 1 staff as an authoritative voice they can call on to protect their programs.

We do see signs of strain in the state monitoring system. We have spent some time discussing and providing examples about compliance in order to illustrate the origins of the strains and how they operate. Subtle changes appear to be taking place. These changes are partly due to growing familiarity and perhaps even complacency within the Chapter 1 system. For some, on-site monitoring has become too routine. This is not to suggest that the system is in trouble, and we do not believe that monitoring efforts need to be redoubled. Rather, a modest redesign of the state monitoring role without increasing its level of effort appears all that's needed to detect the apparent noncompliance our field staff reported. Random rather than regular monitoring, for example, both in terms of times visited and program elements reviewed, may inject renewed attentiveness into the system. Rotating monitors to new districts or using team monitoring may help as well. Finally, some extra attention should be paid to how to gauge allowable noninstructional time.

Instead of more monitoring, our study suggests that the greater need in district Chapter 1 programs is for technical assistance to improve program quality. Many Chapter 1 staff, particularly in small and rural districts and

states with few highly trained Chapter 1 teaching specialists, expressed the need for help: materials, staff training, and personal rather than written technical assistance. Although state efforts are only beginning and require extensive time, a federal mandate for program improvement would assist the small cadre of state Chapter 1 staff with curriculum and instruction backgrounds to expend their efforts.

During the early days of Title I, the states' focus on compliance was a necessary consequence of the complexities of the new legislation and of the new federal philosophy that it embodied. The need for program assistance also existed, but in the mid-1960's, the technical resources that could provide that help were scarce nationwide. Research on curriculum and instruction were sketchier still; even if the assistance capacity had been available, few curricula and techniques that would improve Title I programs had been identified. The state's early attention to clarifying the law and developing a structure for complimenting it was appropriate at that time. But the times have changed.

Now districts understand the law. Moreover, the vast majority agree with its intent. At the local level, one does not hear anxiety and doubt about compliance or about Chapter 1's requirements. But many local voices want to improve Chapter 1 curricula and teaching methods. The states' 20 year focus on compliance has doubtless contributed to the relative absence of state assistance for program improvement. Now may be time to strike a better balance.

CHAPTER 6

TRENDS IN STATE CHAPTER 1 ADMINISTRATION AND POLICY OPTIONS

INTRODUCTION

Having reviewed our findings on Chapter 1 administrative policies and practices, the factors underlying them, and their effects, we turn now to some concluding observations on the development of state program administration. Most of these conclusions reflect this study's primary emphasis on changes in administration occurring since the shift to Chapter 1, but the 16 years of program evolution under Title I have also had their effect on state and district response to that shift. This chapter, then, contains observations on long-term as well as recent trends.

The chapter begins with conclusions that seem well enough established to continue over the next few years, barring radical change in Chapter 1's legal framework. Influences helping to shape these trends are included in the discussion. The second section outlines federal policy options in light of projected trends and past federal efforts.

PROJECTED TRENDS

The trends discussed here have emerged forcefully and show every likelihood of continuing over the next few years. They are: little rethinking of the state role despite changing federal signals; diversity in administrative approaches across states; changes in the composition of state Chapter 1 staff; and less state presence in districts, coupled with less state knowledge of district activity.

The Absence of a Trend toward Rethinking the SEA Role

State Chapter 1 administration has not been transformed since Chapter 1 law went into effect. States did not use the broad and vague Chapter 1 language (or the consolidating language of the rest of ECIA) to reshape state agencies into functional units, or to merge Chapter 1 with other state or federal programs. No states changed their organizational structure. The one state consolidating Chapter 1 with other supplemental programs had initiated the consolidation before Chapter 1. States also did not change

the nature of their relationships with school districts. All but one of the nine states retained the generalist structure: one professional consultant generally responsible for all functions (e.g., monitoring, technical assistance, application approval) for a number of school districts. Only one state reduced staff and state functions more than one would expect from the set-aside reduction -- the changing state that sought to deregulate Chapter 1.

The little rethinking of state roles stems from several sources, including the federal law. The shift in federal administration is perhaps better characterized as a policy of nonregulation than one of deregulation. The absence of clear directions, coupled with a continuing audit function, led most states to retain an emphasis on paper compliance activities. Fiscal conservatism and wariness of audits are also strong state influences precluding much change in traditional Chapter 1 administrations, the bulk of states in our sample.

The stability of Chapter 1 administration discouraged change as well. The vertical network of working relationships is well established, Chapter 1 staff are strongly committed to the program, and many are long-term veterans of Title I. The average tenure of Title I staff is slightly over eight years, and in the majority of states studied, the Chapter 1 director has worked with the program in some capacity for an average of 16 years. Embedded procedures also are resistant to change, either because they are seen as "best practice" or because the resources needed to make more than incremental changes appear excessive.

Diversity in State Administration

As demonstrated by the clustering of traditional and changing states, state Chapter 1 administrations are diferent from one another. Regulatory compliance has a dominant role in some states, while reorganizing and some attention to program improvement are occurring in others.

Although we have yet to see structural changes in state administrations, emphases and activities are changing. Traditional state Chapter 1 administrations have become more compliance oriented, not only by stripping away staff development and program improvement activities when the set-aside was reduced, but also by assuming a stronger compliance focus in the absence

of federal guidance. Instead of making proportional cuts in all activities when the set-aside was reduced, they sought to protect the compliance core by dropping other activities. They prefer to maintain the Title I legal framework and the specificity of the Title I regulations to prevent audit exceptions.

The changing state Chapter 1 administrations are reorganizing Chapter 1 administration in response to state and state education agency initiatives. Consolidation efforts in one state predated Chapter 1, but the other two are responding to Chapter 1 law. One took deregulation to heart and for several years greatly reduced monitoring and eliminated all regulatory guidance to districts. It has increased on-site monitoring and guidance somewhat on federal instructions, but not to the previous Title I levels. The other shifted its emphasis from compliance to program quality.

In the poor, rural state seeking a role in program improvement, we heard that Chapter 1 "allowed time for a new kind of contact with our districts" and that the staff "had shifted from being regulators to being problem solvers." Chapter 1 gets extra attention here, they reported, because it is the primary source of supplemental funds that can be directed toward school improvement. Two other rural states in the larger sample also noted the importance of Chapter 1 for program improvement initiatives, and asserted that their school improvement activities have increased, although we made no district visits to check these statements.

In the absence of strong federal directions, we anticipate continued diversity among states in administration, as state context and initiatives more strongly influence program management. We anticipate change will arise not only in states that are reorganizing, but in traditional state administrations as well. Funds are no longer sufficient to support the compliance structure created during the later years of Title I. The reduced set-aside and inflation have substantially eroded buying power. Some of these states may redirect their efforts if the current structure continues to spread staff and regulatory effectiveness too thinly.

Staff Changes

A few trends in the staffing of Chapter 1 offices in our sample were nearly universal. These trends have begun to affect SEA behavior and have the potential of creating much larger changes over time.

First, the reduction in the administrative set-aside caused SEAs to lose Chapter 1 staff, and the positions involved were seldom those whose mission was overseeing compliance. Instructional specialists, staff developers, and evaluators were far more likely to be cut than were monitors. This tendency has to a large extent left the Chapter 1 offices populated with generalists: in the starkest terms, the situation is that everyone is responsible for getting districts into compliance, while no one is charged with concentrating on any particular facet of the program.

The second trend, working counter to the first, is that newer staff members have recent school level experience and expertise in curriculum. Even in some strongly compliance oriented states, the few new staff positions posted have recommended or required such backgrounds. A strikingly large number of these newer staff members are women, which may reflect a widening of pathways into SEAs to include persons who have spent relatively little time as local administrators. Although the curtailed SEA missions due to funding cuts generally prevent these staff members from formally assuming such functions as local staff development, they are trying to couple greater attention to program design with their monitoring roles.

Supporting the concern of these newer staff members with program related issues is the tendency for newer Chapter 1 directors to take a greater interest in educational improvement. It is possible that others with an interest in program improvement will move into Chapter 1 leadership roles, as replacements are made for the directors in our sample who are approaching retirement age.

The effectiveness of the new staff may be limited by their lack of expertise in technical assistance. While a background in a local Chapter 1 program provides much that is useful in this regard, it does not necessarily impart knowledge of how to help programs improve from the outside. This challenge may well emerge as a problem for the changing staffs of Chapter 1 offices.

Less State Presence in Districts, Coupled with Less State Knowledge of District Activity

Shifting the administrative set-aside from 1.5 to 1 percent of the state's allocation reduced state staffing and increased staff district case loads. With more districts to monitor, consultants spent less time in any given school district. Either districts are visited less often, or, if the same schedule continues, the number of person days per visit has diminished.

The reduction to the 1 percent level does not mean that the state cannot effectively monitor compliance. What is important in compliance monitoring is to protect the "visible presence" of state consultants in school districts to aid district coordinators and to remind others that guidelines must be followed. District Chapter 1 coordinators need to be able to expect a prompt response from SEA consultants when district personnel or principals appear to want to use Chapter 1 funds in nonallowable ways. How often the SEA consultant makes a formal monitoring visit may be less important than the knowledge that state staff are available for emergencies.

Because the role of district coordinators for compliance has increased, especially in the changing states, states may want to consider somewhat more formal pre-monitoring or self-reviews such as those followed in the consolidated changing state. In this state, where districts must complete formal self-reviews of compliance before the SEA monitoring visit, the self-review in one district visited revealed a needed program change that was then made before the SEA monitoring visit.

It is also important to protect the adequacy of state compliance information. Some state monitoring may have become too routine or too narrowly focused on monitoring check-list items to provide accurate information. Some SEA consultants also appear to spend considerable effort on peripheral paper compliance activities (e.g., reviewing Chapter 1 student files for individual educational plans) that could be reduced. Random monitoring or spot-checking may serve as well as these more intense efforts to ensure that adequate documentation is maintained. A few state directors are rotating monitoring staff assignments every few years to discourage long-term staff work with the same districts and to help state staff remain attentive. In a few other states, state monitoring visits are made by teams of state

staff and Chapter 1 staff from other school districts. Such team monitoring may also help counter the negative effects of routinization.

Certain document requirements and district compliance monitoring can be somewhat streamlined. This may involve complicated shifts, for example to consolidated applications and monitoring in conjunction with other federal or state programs; or more simple adjustments to minimize the time spent on within-state travel. One rural state, for example, changed from annual visits by one person to visits every three years by a monitoring team. They estimated saving about 120 person days a year, mostly on travel time. They hope to put the time savings into program improvement and to maintain their visible presence role through continued document review and by being "on call" for districts.

At the same time, some changes in administrative policies have resulted in less state knowledge of district activity. In the three changing states, districts are allowed to meet comparability requirements without testing whether Chapter 1 schools and non-Chapter 1 schools have comparable resources. Without the tests, no resources are reallocated, yet reallocation was a frequent occurrence in the large districts in our sample where tests were conducted. This is not to say that large districts in states requiring no test are out of compliance; rather, these states have no information about whether resources need to be reallocated.

The other area where state knowledge of district activity may be insufficient is that of non-instructional staff time charged to Chapter 1. Compliance in this area is difficult to measure and there are no good "rules of thumb" to apply. Differences are to be expected not only by district size but also by district initiatives for instructional change in Chapter 1. Consultants could, however, compute average administrator/student ratios for districts of different size categories and then review more carefully those that are administratively top heavy for their size category.

FEDERAL POLICY OPTIONS

Federal policy options for state Chapter 1 administration are treated under two headings: those that ensure continuing compliance with Chapter 1's legal framework and those that promote an SEA role in quality Chapter 1 programming.

Ensuring Continued Compliance with the Intents of Chapter 1

Federal requirements provide the enforcement means and the sanctions that state monitors use to negotiate programs with school districts. Although the structure is not specific and must be interpreted by state and district officials, it provides the legal basis for all program administration. Federal requirements are most influential when they are operationally defined, are clearly tied to enforcement, and consist of activities that can be routinely monitored. Perhaps the best examples are fund allocation requirements and evaluation.

Federal targeting and fiscal requirements in the hands of state monitors and district coordinators have helped offset central office or school interests to spread Chapter 1 funds across ineligible schools and students. There is sufficient evidence in this study and others to suggest that the absence of such targeting requirements would spread services to more students and schools, because few states and districts have a commitment to educationally disadvantaged or low income children or have contributed funds to Chapter 1 when allocations dropped. (See also McDonnell and McLaughlin, 1982; McLaughlin et al., 1985.)

Federal Title I evaluation requirements coupled with technical assistance created a national data base, aggregated from district test data. The national evaluation reporting system continues without detailed legal language, in part because states and districts support the gathering of national data and in part because they have found their own uses for the information.

We see no need for Chapter 1 to become any more prescriptive, and we do not recommend changes in the legal framework. A cadre of committed and experienced state and district Chapter 1 personnel operate the program, the compliance structure is in place, the vast majority of districts want to run legal programs, and states have identified and seek to work out agreements with the few "at risk" districts.

To be most successful, the federal government should recognize the collaborative nature of state and district compliance monitoring, and support the experience, commitment and efficiency of the vertical network of state and

district Chapter 1 personnel. Now that the compliance structure is in place and headline audit exceptions a thing of the past, state monitoring activities serve less a fault-finding function and more a symbolic function--a visible presence supporting district Chapter 1 staff and reminding other personnel that the legal framework must be followed. In those instances where apparent noncompliance occurs, it seems to result from breakdowns about what local monitoring is to include and from state monitoring that is too routinely done or too narrowly focused. To counter such routinization, the federal government could encourage the use of alternative SEA monitoring mechanisms (such as consolidated monitoring, team monitoring, and district self-reviews); and promote spot or random checking of district records rather than the review of nearly all documents we found in some states.

Federal monitors, through program reviews and other means, could also assist individual states as needed. Our study found that federal monitoring teams can be effective, especially in setting the limits on acceptable state practice. In one changing state, for example, federal program reviews curtailed deregulation; on-site monitoring was increased and methods of assessing comparability were changed in part to avoid another critical federal review.

In two specific content areas, the federal program office could help states to ensure that they have sufficient knowledge of district activity. One area is whether districts should test comparability annually rather than merely keep district policies on file. This would be particularly important in districts with a history of problems in meeting comparability requirements. A second is how to gauge the appropriate mix of noninstructional time and then whether state consultants in some outlier districts should compare district staff time budgeted for Chapter 1 with actual time spent on Chapter 1 activity. This would have a major effect on districts, since they would probably have to institute time sheets.

Another possible activity for the federal program office relates to concerns, outlined in Chapter 4, that the absence of detailed language on parent involvement reduced the legitimacy of parent participation in Chapter 1. Federal monitors could track state and district responses to the recent regulations on parent involvement to see whether the participation of parents in Chapter 1 programs increases.

There appears to be no need to alter the 1 percent set-aside for state Chapter 1 administration, provided the above activities are supported. Promoting the visible presence of SEA consultants in districts and reinforcing the vertical network of state and local Chapter 1 personnel require no additional resources.

Some consideration, however, could be given to increasing the allocation for the "floor" states. Most floor states nation-wide are relatively poor, rural states with a large number of small districts; on average, they have 220 districts each. Individual staff case loads of 55 to 60 districts are not uncommon. An increase in funds from the annual $225,000 may help offset the costs of travel time to districts and losses from inflation.

Promoting an Emphasis on High Quality Programming

Recent federal efforts in Chapter 1 program improvement appear to have had little effect. The program improvement language added in the 1983 Technical Amendments and encouragement from federal officials have not transformed SEA practices. Most SEAs pay little attention to program quality and lack incentives to require that districts attend to it or assist them in improvement efforts. (See also McDonnell and McLaughlin, 1982, p. ix.) In only two of the nine states did the Secretary's Initiative for Program Improvement appear to play a significant role. In three other states, the national recognition program of outstanding Chapter 1 programs appeared to be of at least some importance.

Athough these efforts have had limited effects, one should keep in mind that throughout the 16 years of Title I, the federal emphasis was almost entirely on compliance. The effectiveness of federal policy toward disadvantaged children was not judged in terms of the competence, innovativeness, and responsiveness of state and local educational agencies (Elmore and McLaughlin, 1982, p. 170); rather, it was judged in terms of targeting services for eligible students. There was little federal pursuit of an assistance strategy. Federal policies were criticized for not taking into account the behavior and context of district or school personnel, and for not supporting activities that would enable them to function more effectively (Elmore, 1979; Farrar, DeSanctis, and Cohen, 1980; Lipsky, 1978; Lipsky, 1980; Sieber, 1981).

Some have also argued that compliance activities interfered with program improvement (McDonnell and McLaughlin, 1982, pp. 112-113.) Within our sample, however, Chapter 1 administrative requirements do not appear to impede program quality, although it is uncertain how much they enhance it. Nevertheless, there is some evidence that the size, scope, and quality requirements may have helped draw high quality teachers into the program. Our school-based interviews also indicated that Chapter 1 is part of an integrated continuum of service and not an isolated program.

Federal program improvement initiatives undertaken now may well find state Chapter 1 offices more receptive. Newer staff have recent school experience and expertise in curriculum and pay attention to program design, along with their monitoring roles, as time permits, although some have little background in providing technical assistance. Although we did not see as much of a state shift from regulatory compliance toward assistance with local programs that was noted in other recent studies of state Chapter 1 administration, some capacity for program improvement is now evident in most states. (See Dougherty, 1985, p. 161; McLaughlin et al., 1985, p. 157). There is also a growing demand for some assistance. Except for the largest districts that employ staff with expertise in curriculum and instruction, many Chapter 1 programs expressed a need for assistance on program quality concerns. Although state efforts are only beginning and require time to overcome traditional barriers to an altered state role, a federal mandate for program improvement would assist the small cadre of state Chapter 1 staff with curriculum and instruction backgrounds to expand their efforts.

If Congress wanted to enhance state program quality efforts, two mechanisms are available: an increase in the state set-aside for administration or a multi-year discretionary grant program. The purposes of the two would be the same: to create program improvement expertise in states where it is lacking, and to enable staff with such expertise to offer it to school districts. A variety of activities could be supported, provided they included such areas as curriculum, teaching strategies, program design, and coordination with other offerings for students. Support for providing assistance to districts could be offered as well. Staff could work with school and program improvement activities elsewhere in the SEAs provided Chapter 1 staff concentrated their efforts on Chapter 1 schools. At the local level, program

improvement activities could include the entire Chapter 1 school, and would not be restricted to only Chapter 1 staff within it. Some consideration could also be given to funding consortia of districts for program improvement activities, especially districts experienced in program improvement.

Tying federal funding directly to program improvement makes it more likely that such activities will be pursued, unlike earlier efforts that encouraged but did not specifically earmark funds for SEAs to deal with program quality.

The advantage of the set-aside mechanism is that it represents a federal mandate for state assistance with quality programming, however defined. Although it is an external stimulus, this mandate may help increase state influence in districts with strong local control. The set-aside would also assure funding for the length of the authorization period, usually a somewhat longer period than that of multi-year grants. States may then be somewhat more likely than under a discretionary grant to hire and support staff. Under a set-aside, however, it may be difficult to separate the emphasis on compliance and program development activities, so that some traditional states may be tempted to use the funds to beef up compliance activities. Federal procedures to ensure that funds are used for their designated purpose could also lead states to concentrate more on how they would comply with the provision than on how they would carry out the federal intent. Requiring a program improvement plan for ED approval before funds are released could also be seen to conflict with the deregulatory spirit of Chapter 1.

The advantages of a multi-year grants program include a clear separation of compliance and program improvement, with less danger of funds being used for regulatory functions. There would also be somewhat more flexibility in funding (e.g., consortia of SEAs or districts could apply and could use the services of regional TACs). Funding would be tied to projects or good ideas and thus would avoid the appearance of federal prescriptiveness better than would the set-aside. The disadvantages of the grants program are the advantages of the set-aside. Although multi-year awards might be intended, grants might actually be made for only one year; therefore states with little interest in program improvement and states needing an explicit mandate to work with school districts might not bid or not make the staff

commitments needed. Either mechanism would highlight an enhanced federal effort to support state Chapter 1 administrations in program assistance to districts.

REFERENCES

Advanced Technology, Inc. Local Operation of Title I, ESEA 1976-1982: A Resource Book. McLean, VA: Advanced Technology, Inc., 1983.

Bell, T.H. "Elementary And Secondary Education Consolidation Act of 1981." Press Release, U.S. Department of Education, April 29, 1981.

Bessey, B.L., D.A. Brandt, P.A. Thompson, L.R. Harrison, Kim E. Putman, and Judith A. Appleby. A Study of State Management Practices: Looking Back at Title I and Toward Chapter 1. Palo Alto, CA: American Institutes for Research, 1982.

Boruch, R.F. and D.S. Cordray. An Appraisal of Educational Program Evaluations: Federal, State and Local Agencies. Evanston, IL: Northwestern University, 1980.

CPI Associates. An Exploratory Study of the Impact of Parent Advisory Councils on the Management and Administration of Title I Programs at the Local Level. Dallas, TX: CPI Associates, 1979.

Darling-Hammond, L., and E.L. Marks. The New Federalism in Education: State Responses to the 1981 Education Consolidation and Improvement Act. Santa Monica, CA: Rand Corporation, 1983.

David, J. Local Uses of Title I Evaluations. Menlo Park: SRI International, July 1978.

Dougherty, J.C., IV. A Matter of Interpretation: Changes under Chapter 1 of the Education Consolidation and Improvement Act. Prepared for the Subcommittee on Elementary, Secondary, and Vocational Education of the Committee on Education and Labor, United States House of Representatives. Serial Number 99-B. Washington, DC: U.S. Government Printing Office, 1985.

Elmore, R.F. "Backward Mapping: Implementation Research and Policy Decisions." Political Science Quarterly, Vol. 94, No. 4, Winter 1979-80, pp. 601-616.

Elmore, R.F. and M.W. McLaughlin, "Strategic Choice in Federal Education Policy: The Compliance-Assistance Trade-Off." in Ann Lieberman and Milbrey W. McLaughlin (Eds) Policymaking in Education. Chicago: University of Chicago Press, 1982, pp 159-194.

Farrar, E., J.E. DeSanctis, and D.K. Cohen. "Views from Below: Implementation Research in Education." Teachers College Record, Vol. 82, No. 1, Fall 1980, pp. 77-100.

Gaffney, Michael J., Catherine Thomas and Robert Silverstein. An Analysis of the Legal Framework for State Administration of Title I of the Elementary and Secondary Education Act of 1965. Washington, DC: Lawyers' Committee for Civil Rights Under Law, 1977.

Goettel, R.J., B.A. Kaplan, and M.E. Orland. A Study of the Administration of the Elementary and Secondary Education Act (ESEA), Title I in Eight States. Syracuse, NY: Syracuse Research Corporation, 1977.

Hill, P. Enforcement and Informal Pressure in the Management of Federal Categorical Programs in Education. A Rand Note. Santa Monica, CA: Rand Corporation, 1979.

Hinkley, R. (Ed.). Student Home Environment, Educational Achievement, and Compensatory Education. Report Number 4, Sustaining Effects Study. Santa Monica, CA: System Development Corporation, 1979.

Jung, R. "The Federal Oversight of Title I of the Elementary and Secondary Education Act (ESEA). A Longitudinal Case Study from 1965 to 1978." Unpublished Ph.D. dissertation, Stanford University, School of Education, 1983.

Kennedy, M.M., R.N. Apling, and W.F. Neumann. The Role of Evaluation and Test Information in Public Schools. Cambridge, MA: The Huron Institute, 1980.

Kirst, M. and R. Jung. "The Utility of a Longitudinal Approach in Assessing Implementation: A Thirteen Year View of Title I, ESEA." Educational Evaluation and Policy Analysis, Vol. 2, No. 5, September-October, 1980.

Lipsky, M. "Standing the Study of Public Policy Implementation on Its Head." in W. D. Burnham and Martha Wagner Weinberg (Eds) American Politics and Public Policy, 1978, pp 391-402.

Lipsky, M. Street Level Bureaucracy. New York: Russell Sage Foundation, 1980.

Lorber, M. Chapter 1 ECIA Administrative Practices. Washington, DC: Decision Resources, Inc., 1985.

McDonnell, L.M., and M.W. McLaughlin. Education and the Role of the States. Santa Monica, CA: Rand Corporation, 1982.

McLaughlin, M.W. "States and the New Federalism." Harvard Educational Review, Vol. 52, No. 4, November 1982, pp. 564-583.

McLaughlin, M.W., P.M. Shields, and Dale J. Rezabek. State and Local Response to Chapter 1 of the Education Consolidation and Improvement Act, 1981. Palo Alto, CA: Institute for Research on Educational Finance and Governance, 1985.

Martin, R. and P. McClure. Title I of ESEA: Is It Helping Poor Children? Washington, DC: Washington Research Project of the Southern Center for Studies in Public Policy and the NAACP Legal Defense of Education Fund, Inc., 1969.

National Institute of Education. Administration of Compensatory Education. A Report from the National Institute of Education. Washington, DC: National Institute of Education, September 1977.

Sieber, S.D. "Knowledge Utilization in Public Education: Incentives and Disincentives." In Rolf Lehming and Michael Kane (Eds) Improving Schools: Using What We Know. Beverly Hills: Sage Publications, 1981, pp 115-167.

Wang, M., et al. The Nature and Recipients of Compensatory Education. Report Number 5, Sustaining Effects Study. Santa Monica, CA: System Development Corporation, 1978.

Weick, K.E. "Educational Organizations as Loosely Coupled Systems." Administrative Science Quarterly, Vol. 21, 1976, pp 1-19.